



# SUPPLIER CODE OF CONDUCT

October 2023



Where  
fresh thinkers  
bloom



Ensuring the principles of Sustainability and development is a key element of the Epta Group values and forms an integral part of our Supply Chain and Procurement strategy.

Suppliers are expected to be aware of, understand and have processes in place to comply with applicable laws and regulations in the regions where it operates or conducts business to adhere to internationally recognised human rights as well as environmental, social, and corporate governance standards ("ESG Standards") as in particular laid down in international conventions.

Epta Group will work with our suppliers to further develop sustainability in our supply chain and the principles in this Supplier Code of Conduct are an important part of our supplier selection and evaluation. We expect you, as a supplier, to support and embrace these standards and look to replicate these further down your supply chain.

Accordingly to Epta Group vision: *Building sustainable refrigeration, together*

we are committed, together to:

## Environment & Health and Safety

- Comply with all relevant environmental, health and safety regulations and applicable standards<sup>1</sup>
- Operate in an environmentally responsible and resource-efficient manner, covering the key areas of natural resources and conservation.
- Act in a responsible manner in selecting supply chain partners and your influence to enhance the environmental performance throughout the value chain.
- Use resources efficiently and shall seek to reduce resource consumption including raw materials, energy, water, and fuel, as well as emissions to air, water, and land.
- Promote safety and environmental awareness for product development, manufacture and disposal of products and waste.
- Ensure that product quality and safety meet applicable standards.
- Encourage the development of a corporate culture in the field of health and safety at work, through worker awareness programs, providing specific initiatives and collaboration with expert partners on these issues
- Use environmentally friendly processes and to protect your employees, neighbours and the general public from any environmental impact or hazards.
- Minimize impact on biodiversity and climate change to protect the livelihood of people.

---

<sup>1</sup> ISO14001 Environmental management systems; ISO5001 Energy management; ISO18001 Standard for Health and Safety management systems

## Social

- Ensure respect and protection of workers' fundamental human rights, condemning child labor and paying particular attention to the most vulnerable people, in compliance with all applicable local laws, regulations and international standards<sup>2</sup>
- Refuse forced, compulsory or any human trafficking labor in our supply chain. All work must be conducted on free terms and there shall be no withholding, destruction, confiscation or concealment of any workers identity or documents.
- Promote a culture of equal opportunity for all and will not tolerate discrimination on the basis of gender, race, religion, age, disability, sexual orientation, or any categories covered by local laws.
- Comply to all applicable standards relating to working conditions in accordance with local laws, regulations and standards across the entire workforce and are expected to provide employees with fair and competitive compensation and benefits to support equal pay for work and/or minimum standards.
- Provide a safe healthy working environment and take precautions to prevent accidents and injury.
- Enable employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.
- Undertake to comply with the applicable laws and regulations on materials originating from conflict-affected and high-risk areas (CAHRAs) to assure any "conflict minerals" 3TG (Tantalum, Tin, Tungsten and Gold) and cobalt do not directly or indirectly finance or benefit armed violence or contribute to human rights abuses.
- The scope of policies and due diligence shall be in alignment with The Organization for Economic Co- Operation and Development (OECD) due diligence guidance for responsible supply chains of minerals from conflict affected and high risk areas

---

<sup>2</sup> The Universal Declaration of Human Rights (UDHR); The Ten Principles of the UN Global Compact; United Nations Guiding Principles on Business and Human Rights; The OECD Guidelines for Multinational Enterprises; *the 8 fundamental conventions of the ILO*.

## Governance

- Consider business integrity as the basis of business relationships.
- Identify and comply with all applicable national and international laws and regulations including conformance to permits, licenses, registrations, and certificates.
- Commit to acting professionally, fairly and with integrity in all business dealings and relationships and will implement and enforce effective policies and procedures to counter the facilitation of any tax evading activities, corruption, bribery and money laundering.
- Avoid any situation that may constitute or generate a conflict of interest and promptly communicate any conflicts of interest concerning EPTA Group and/or its persons.
- Adopt fair, impartial and ethical commercial practices, which exclude any form of limitation of free and lawful competition and which guarantee compliance with the relevant laws.
- Respect confidential and private information for your employees, customers and suppliers as well as protecting data and intellectual property.
- Implement business continuity plans for operations and supply.
- Develop and use management systems and controls related to this Code of Conduct, applicable laws, regulations, and standards.
- Not engage in any illegal or unethical behavior and are expected to uphold standards of fair business practices.

## Sustainability

- Undertake all reasonable efforts to have clear environmental targets, strategies, and policies in place, these should cover environmental aspects and the impact of operations and in the value chains.
- Undertake all reasonable efforts to have management systems in place to continuously improve energy efficiency in your operations.
- Seek to minimize and prevent the release of hazardous substances or active ingredients via spills or via emissions to the environment.
- Strive to provide sustainable value on every contract and encourage supply chain partners to support in achieving these sustainable objectives and drivers.
- Look to make progressive improvements in your operations and through the adoption of good operating practices to ensure the responsible use of natural resources, cleaner production, pollution prevention and the progression of products with lower environmental impacts.
- We expect our suppliers to be transparent about their raw material sourcing practices and to share upon request relevant traceability information that supports Epta Group broader responsible sourcing goals.
- We expect our suppliers to adopt a their own management system (monitoring, reporting and improvement) to promote ESG compliancy at each level of the common Value Chain

The principles expressed in the Supplier Code of Conduct are an important part of our supplier selection and evaluation process and are intended to establish a framework for positive development of procurement practices through regular dialogue and working relationships. Our suppliers are required to acknowledge these principles or demonstrate your commitment with your own code of conduct or policies that embrace these standards.

We reserve the right through a combination of audits, self-assessments and documentation reviews to determine compliance and agree improvements plans where necessary. Periodic reviews and follow-up audits may also be conducted to monitor the compliance levels.

We expect, and also encourage suppliers to develop and implement relevant management systems that are appropriate for their company size and industry, to ensure compliance with applicable laws and regulations.

If we become aware of issues or have concerns regarding breaches of these principles and no corrective actions are implemented or improvements made or there is an incident of severe violation, Epta Group reserves the right to review the continuation of the commercial relationship and take appropriate actions including and up to termination of contracts.

Nothing in this document is intended to supersede more stringent provisions in any particular contract or agreement.

This document represents the first version of the Supplier Code of Conduct, available on the website [www.eptarefrigeration.it](http://www.eptarefrigeration.it) Epta undertakes to periodically review and update this document.

Milan, October, 2023

EPTA Group

Group Purchasing and Procurement Director  
Simone Salani

A handwritten signature in black ink, appearing to read "Simone Salani".

(Signature)

SUPPLIER: \_\_\_\_\_

Supplier Function, Date and Signature: \_\_\_\_\_