

**BIANCHI INDUSTRY SPA
SUPPLIER CODE OF CONDUCT**

Version approved by the Board of Directors on 21/02/2025

Introduction:

Bianchi Industry is a company operating in the Vending sector through the production of vending machines and professional coffee machines.

It is present in Italy and internationally and firmly believes that sustainable sourcing is an effective means to promote its values of sustainability and responsible practices throughout the value chain.

The Company, striving to build strong and lasting relationships and partnerships with its suppliers, intends to promote responsible and sustainable behavior throughout its supply chain by sharing these values with its suppliers (hereinafter also referred to as "**Suppliers**").

This **Supplier Code of Conduct** (hereinafter also the "**Code**") is based on Bianchi Industry's Code of Ethics, which aims to enhance and strengthen the relationship with its stakeholders.

This Code complies with principles of social, environmental and legal responsibility, in line with international standards and national regulations, such as:

- The United Nations Universal Declaration of Human Rights;
- The International Labor Organization (ILO) declaration;
- Fundamental principles and rights in Labor;
- Children's rights and business principles developed by UNICEF and UN Global Compact;
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women;
- ISO 9001, ISO 14001, ISO 45001 standards and guidelines;
- Legislative Decree 231/2001 (Corporate Administrative Responsibility);
- Legislative Decree 152/2006 (Environmental Code);
- Legislative Decree 24/2023 (Whistleblowing).

This Code is binding for all Bianchi Industry suppliers and forms an integral part of the contractual agreements made with Bianchi Industry. Bianchi Industry requires all of its Suppliers and their collaborators, subcontractors and other parties working on their behalf to adhere to the principles and provisions set forth in this Code.

By accepting this Code, the Supplier agrees to behave in accordance with the values and principles outlined in this document.

Bianchi Industry reserves the right to perform all the most appropriate actions and controls, including through questionnaires or periodic audits, in order to ascertain and verify whether its current or potential business partners meet the requirements set forth in this Code.

The aim is to protect people and the environment by ensuring a value chain that operates in accordance with applicable laws, regulations and contractual provisions. There is also a commitment to build and promote a fair, transparent and sustainable supply chain.

1. General Principles

Bianchi Industry's commitment:

Bianchi Industry, as established in its Code of Ethics, is committed to acting in accordance with the following general principles:

- Impartiality
- Honesty
- Correctness
- Confidentiality
- Transparency
- Quality of services
- Fair competition
- Suppliers appreciation
- Equity of authority

These values are strongly linked to the key areas Bianchi Industry considers fundamental: people, the environment and business ethics.

Supplier's commitment:

The Supplier is required to act in accordance with the laws in force in each individual country in which they operate, to apply the principles outlined in this Code to all their business relationships and to continuously improve their ethical and sustainability performance by applying appropriate conduct.

In the event that, for whatever reason, the Supplier is able to ensure only partial compliance with the provisions of this Code, the Supplier undertakes to promptly notify Bianchi Industry and to cooperate with the latter to establish the most appropriate actions to ensure compliance with this Code.

2. Human rights and labor rights

Bianchi Industry's commitment:

Bianchi Industry, as established in its Code of Ethics, protects the integrity and dignity of all people who work with the Company, guaranteeing working conditions that respect human rights as established by the United Nations Declaration of Human Rights and the Fundamental Conventions of the International Labor Organization.

Bianchi Industry prohibits all forms of child labor, forced or compulsory labor, in accordance with ILO Conventions (138 and 182). Bianchi Industry protects equal opportunities and fights discrimination, violence and harassment in the workplace. Bianchi Industry provides regular employment contracts and respects trade union rights.

Supplier's commitment:

The Supplier is committed to:

- To oppose forced labor and prohibit any form of modern slavery.
- Establish labor relations recognized under their national laws and ensure regular contracts. Suppliers shall act in compliance with the prescribed regulations of the International Labor Organization (ILO), particularly Convention 138 on Minimum Age of Employment and Convention 182 on the Worst Forms of Child Labor.
- Reject any form of discrimination in the workplace, including on the basis of gender, ethnicity, religion, language, political opinions, trade union membership, or social status.
- Ensure equal opportunities **and fair treatment** for all workers.
- Employ only legally eligible workers.
- Protect personal data and maintain confidentiality.
- Ensure the adoption of selection and evaluation processes based on criteria of merit, competence, and feasible and achievable goals.
- Recognize fair treatment of its staff in relation to their role, commitment and achievements and to promote fair redistribution of the value created.

3. Health and Safety at work

Bianchi Industry's commitment:

Bianchi Industry, as established in its Code of Ethics, ensure a safe working environment, providing adequate personal protective equipment and complying with Legislative Decree 81/2008, in order to protect the health and safety of the people working in the Company. Bianchi Industry has established a Safety Committee the aim of setting up a streamlined and effective system of internal reporting for accidents or safety risks, ensuring that all issues are taken into consideration by the right interlocutors and can be resolved effectively in a short time.

Supplier's commitment:

The Supplier is committed to:

- Comply with national and international health and safety regulations.
- Minimize risks of accidents, injuries, and occupational diseases.
- Provide adequate personal protective equipment (PPE).

4. Environment and sustainability

Bianchi Industry's commitment:

Bianchi Industry, as established in its Code of Ethics, has in place a sustainable transition that involves a series of concrete activities and actions to achieve goals in order to protect the environment in every activity, operating in full compliance with applicable laws and orienting its actions to the principles of prevention, precaution, eco-innovation, green and circular economy.

The company follows a sustainable transition strategy, minimizing environmental impacts while complying with Legislative Decree 152/2006.

Supplier's commitment:

The Supplier is committed to:

- Use natural resources responsibly and support green economy
- Minimize impacts on natural ecosystems and disruption to local communities resulting from its activities by limiting, where possible, the generation of waste, emissions and effluents, and promoting the recovery and reuse of waste.
- To operate in compliance with applicable domestic and international laws, including export and export control laws, and to operate in accordance with the requirements of Bianchi Industry's Environmental Management System.
- Do not use prohibited substances and to handle potentially hazardous substances in accordance with current regulations.
- Pursue the goal of a responsible supply chain by declaring to Bianchi Industry the presence and origin of minerals from conflict areas (e.g., tin, tantalum, tungsten, gold) in products supplied to Bianchi Industry, which reserves the right to request documents, information, and other evidence of the accuracy of their representations and warranties from Suppliers.

5. Ethics and business practices

Bianchi Industry's commitment:

Bianchi Industry, as established in its Code of Ethics, recognizes the importance of conducting its business in compliance with legality, with integrity, transparency and fairness in all countries in which it operates.

Bianchi Industry ensures business integrity, fights fraud and corruption, and complies with Legislative Decree 231/2001.

Bianchi Industry is committed to complying with antitrust regulations and ensuring transparency in business processes.

Supplier's commitment:

The Supplier is committed to:

- Comply with anti-corruption laws and fair competition rules.
- Operate in full compliance with Bianchi Industry's anti-corruption procedure and in accordance with the competition, antitrust and trade regulations applicable in each country in which they operate.
- Apply, in the selection of its suppliers, the same criteria of impartiality and fairness that Bianchi Industry is inspired by.

- Do not offer, give or receive improper payments or other benefits, or encourage or enable others to do so, in order to obtain or retain an advantage, even where such practices are considered customary in a given context.
- Do not offer Bianchi Industry personnel and, in general, anyone performing activities on behalf of the Company, gifts or other benefits aimed at obtaining favorable treatment of any kind, even if only potential.
- Report to the Legal Department of Bianchi Industry any incidents of bribery or any other fraudulent behavior, even if only attempted or suspected, carried out by any person (internal or external to the Company).
- Firmly oppose all forms of laundering of money, goods or other benefits from crime and take measures so that each economic and financial transaction is traced.
- Ensure the provision and transparency to the public, where required and in accordance with applicable laws and regulations, of information regarding activities carried out, corporate structure, financial and non-financial performance.
- Protect Bianchi Industry's intellectual property.
- Do not infringe, tamper with, use, sell, manufacture objects or make industrial use of goods or other objects made by infringing the industrial property rights of others.
- To process the personal data of its data subjects - and in particular those of which Bianchi Industry is the owner - in accordance with the provisions of the data protection legislation in force in the countries in which they operate and the directives, orders and other binding instruments of the competent national supervisory authorities.

6. Local Communities

Bianchi Industry's commitment:

Bianchi Industry, as also enshrined in its Code of Ethics, respects the rights and culture of the local communities affected by its activities and maintains an open dialogue with them. It is committed to mitigating any inconveniences that its activities may cause to local communities. It adopts a business model geared toward contributing to the development of the areas in which it operates, through the creation of job opportunities for local communities, vocational training, employment of local suppliers and promotion of social initiatives.

Supplier's commitment:

The Supplier is committed to:

- Respect the local culture and traditions, as well as applicable regulations, of the countries in which it operates.
- Minimize disruption to local communities by collaborating on the development of shared solutions and ensuring the timely implementation of planned mitigation actions.

- To support local economies by hiring local workers and sourcing from local suppliers, so as to contribute to the economic and social development of the areas in which it operates together with Bianchi Industry.

7. Compliance and reporting (Whistleblowing system)

Bianchi Industry's commitment:

Bianchi Industry aims to work with Suppliers who are able to continuously improve their performance in line with this Code of Conduct. If any non-compliance with this Code of Conduct is detected, Bianchi Industry reserves the right to take any measures provided for in the general terms and conditions applicable to the Suppliers themselves or in any specific contracts entered into with them. In any case, Bianchi Industry is committed to adopting an approach based on mutual cooperation in light of the values set forth in this Code of Conduct.

Supplier's commitment:

Suppliers must report any violations or suspected violations of this Code of Conduct by the Supplier (including its own personnel) or any of its partners and subcontractors, by using the following Internal Channel by sending by registered mail to: Supervisory Board c/o ADR Srl, Via Giosuè Carducci n. 63, 62100 - Macerata (MC), Italy.

All reported circumstances will be promptly and thoroughly investigated by the external manager appointed by Bianchi Industry to manage the Internal Channel. The investigation will be conducted confidentially, protecting at the highest level, where possible, the identity of the person making the report, in compliance with Legislative Decree 24/2023.

Please refer to the Whistleblowing procedure adopted by Bianchi Industry and available on the company website at the following link: <https://www.bianchiindustry.com/en/ethics/>.

8. Monitoring, Due Diligence and Measures.

Bianchi Industry's commitment:

Bianchi Industry undertakes to carry out continuous monitoring to verify compliance with this Code and compliance with the principles and values set forth herein, reserving the right to perform periodic audits against the Supplier, either by means of documentary checks or on-site inspections.

Supplier's commitment:

Suppliers must continuously monitor and document their adherence to this Code of Conduct and maintain the necessary documentation attesting to compliance with the provisions and standards contained herein as well as with applicable regulations.

Suppliers must inform Bianchi Industry immediately of any non-compliance and their planned corrective measures in this regard.

In order to ensure a fair, sustainable and transparent supply chain, the Supplier also commits to:

- Agree to implement the due diligence process with self-certification, data collection and certification.

- Enforce this code of conduct on its subcontractors by implementing a due diligence process throughout the supply chain to the extent that they are involved in the supply of goods and/or services to Bianchi Industry.
- Agree that Bianchi Industry or a third party engaged by Bianchi Industry may conduct verification checks and/or audits, ensuring that it will cooperate during any inspections.
- Promptly address any shortcomings to this Code of Conduct through targeted corrective measures and action.

Provisions:

As provided for in case of violations of the Code of Ethics 231, in the event that non-compliance declared by Suppliers or ascertained by Bianchi Industry emerges, including through the control activities indicated in Point 8 of this Code, Bianchi Industry may require the Supplier to plan and implement the necessary corrective actions.

Bianchi Industry reserves the right to terminate any relationship and/or terminate any contractual agreement with the Supplier who refuses to implement the corrective measures within a reasonable period of time, without prejudice of any kind to the exercise of rights and remedies provided by law and related to such termination.

Notwithstanding the above, in the event that there is a serious breach or default by the Supplier of the provisions listed below, which are considered essential, Bianchi Industry may automatically terminate any contractual agreement with the defaulting Supplier, without prejudice to any rights arising under the law consequential and related to such termination: 2. Human and Labor Rights; 3. Occupational Health and Safety; 4. Environment and Sustainability; 5. Ethics and Business Practices; 6. Local Communities.

9. Revisions and updates

This Code of Conduct was approved by the Board of Directors of Bianchi Industry on 21/02/2025. Bianchi Industry is committed to constantly updating this document to ensure compliance with current regulations.

The current version is available on the Bianchi Industry website at <https://www.bianchiindustry.com/en/ethics/>.

10. Reference

Bianchi Industry business documents:

- Code of Ethics;
- Management and Control Organizational Model pursuant to Legislative Decree 231 of 2001;
- Sustainability Report;
- Quality Policy;
- Occupational Health and Safety Policy;
- Environmental Policy;
- Whistleblowing system;

- ISO 9001 on quality management systems;
- ISO 14001 on environmental management systems.

International guidelines, principles and standards:

- United Nations International Bill of Human Rights;
- United Nations Convention on the Rights of the Child and Adolescent;
- United Nations Convention on the Elimination of All Forms of Discrimination against Women;
- United Nations Guiding Principles on Business and Human Rights;
- Declaration on Fundamental Principles and Rights at Work of the International Labor Organization.