

## SUPPLIER CODE OF CONDUCT

OUR COMMITMENT TO ETHICAL SOURCING

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### Contenuti

	Supplier Code of Conduct	4
1	Respect for human rights	4
2	Environment	4
3	Business Ethics	5
4	Working Conditions and Safety	5
5	Compliance with our Code of Ethics	6
6	Conclusion	6

# **Supplier Code of Conduct**

This Supplier Code of Conduct defines the principles and minimum standards of behavior that every supplier is required to observe when engaging in a business relationship with Transfer Oil.

We firmly believe that **integrity**, **ethics**, **and sustainability** are essential foundations for a solid and long-lasting partnership. We expect our suppliers to share this commitment and to actively contribute to building a responsible value chain.



#### 1. RESPECT FOR HUMAN RIGHTS

#### Forced labor

All forms of forced, bonded, or involuntary labor are strictly forbidden. Workers must be free to leave their employment upon reasonable notice, in compliance with applicable laws and regulations.

#### Child labor

The employment of minors below the minimum working age, established by applicable national or international legislation, is strictly forbidden. Suppliers must implement effective measures to prevent any form of child labor.

#### Discrimination

Suppliers must ensure an inclusive work environment that respects the individual and guarantees equal opportunities.

Discrimination based on race, ethnicity, religion, gender, sexual orientation, age, disability, political opinion, or any other personal characteristic protected by law is not tolerated.



#### 2. ENVIRONMENT

#### **Environmental sustainability**

Suppliers must comply with all applicable environmental laws and regulations in the countries where they operate. They are also expected to adopt practices aimed at minimizing the environmental impact of their activities.

#### Responsible use of resources

Suppliers must manage natural resources — particularly energy and water — consciously and efficiently, promoting waste reduction and the adoption of sustainable solutions, including reuse and recycling.







#### 3. BUSINESS ETHICS

#### Corruption and bribery

Any form of corruption, bribery, or illicit payment is strictly prohibited. Suppliers must fully comply with national and international anti-corruption laws and regulations.

#### **Conflict of interest**

Suppliers must take appropriate measures to prevent situations of conflict of interest that could improperly influence decision-making processes or compromise the impartiality of business decisions.



#### 4. WORKING CONDITIONS AND SAFETY

#### Health and safety

Suppliers are responsible for providing a safe and healthy work environment, in full compliance with applicable occupational health and safety regulations.

#### **Working hours**

Suppliers must comply with legal working hour regulations and ensure that employees are granted adequate rest periods and breaks.



#### 5. COMPLIANCE WITH OUR CODE OF ETHICS

#### **Compliance with our Code of Ethics**

Where applicable, suppliers are expected to comply with the principles outlined in Transfer Oil Code of Ethics, available at the following link:

https://www.transferoil.com/en/about-us/code-of-ethics.aspx





#### 6. CONCLUSION

We expect our suppliers to operate in alignment with the principles set forth in this Code of Conduct, fostering ethical, transparent, and responsible behavior throughout the entire supply chain.

Non-compliance with this Supplier Code of Conduct and/or our Code of Ethics may result in the **suspension or termination** of the business relationship, depending on the severity of the violations identified.



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