



Alkemy S.p.A.  
Supplier Code of Conduct

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## 1. PURPOSE

Alkemy S.p.A. (hereinafter also “Alkemy” or “the Company”) is an international public company and the parent company of the Alkemy Group (hereinafter also the “Group” or “Alkemy Group”), that operates in Italy, Spain, Mexico, USA and the Balkans through its 11 offices located in Milan, Turin, Rome, Naples, Potenza, Cagliari, Rende, Madrid, Belgrade, Mexico City and New York. Across all of its geographies, the Group applies high ethical standards and a strong commitment to evaluating and mitigate its environmental and human rights impacts throughout its supply chain.

In order to maintain our commitment relevant and succeed in reaching our sustainability goals, we also expect from our Suppliers compliance with the applicable laws, respect of essential ethic values and a sustainable behavior.

This Supplier Code of Conduct is based on the intention to further promote continuous advancements in the Group's environmental and social goals for minimizing the possible damaging impacts of its supply chain, sourcing materials, operations, and Suppliers' activities on the environment, human rights, governance and health & safety measures.

In addition to the applicable laws and regulations, the minimal requirements outlined in this document serve as a model for our Suppliers to use when conducting business. We expect that in all business dealings, our Suppliers adhere to it and implement the defined guidelines into practice.

## 2. RECIPIENTS AND SCOPE OF APPLICATION

The Supplier Code of Conduct applies to any organization who interacts with Alkemy S.p.A. and its subsidiaries for the supply of goods or services.

The principles outlined in the current Code of Conduct are encouraged to be adopted and followed by all Suppliers in Alkemy Group's supply chain.

## 3. SUPPLIER CODE OF CONDUCT

### 3.1 ENVIRONMENT

Alkemy and its subsidiaries are aware of the risks that can arise along their whole value chain, therefore we aim to collaborate with suppliers that have a commitment in preserving the environment.

For this reason, Alkemy Group's Suppliers seek to minimize the use of water, energy, plastic and waste and avoid polluting the local environment, making sure that emissions are kept within the limitations set by the local government.

### 3.2 HUMAN RIGHTS

As stated in the Group's Human Rights Policy, the Alkemy Group promises to uphold the human rights of every person involved in its value chain, with a goal of identifying, recognizing, and reducing the risk of unfavorable outcomes for the most vulnerable groups.

Our Suppliers shall conduct themselves in compliance with all relevant local laws and regulations on human rights and, in addition to respect the subsequent human rights:

- Equality of treatment
- Prevention of harassment and discrimination
- Prevention of child labor and forced labor
- Fair wages and working hours
- Freedom of association
- Well-being and work-life balance

### 3.3 HEALTH AND SAFETY

In line with the Group's Human rights policy, another principle that Alkemy Group seeks its Suppliers to commit with is the health and safety of their employees and all related workers. Therefore, it is essential that our Supplier's operations are also in compliance with occupational health and safety laws and regulations.

Due to this reason, our Suppliers shall adhere to all regulations for occupational health and safety in the nation where they conduct business or engage activity. Moreover, all employees and contractors must conduct their work in a healthy, clean and safe environment.

### 3.4 BUSINESS GOVERNANCE

In accordance with the Alkemy Group's Anti-corruption Policy and Code of Ethics, our Suppliers are subsequently expected to follow the same regulations in order to ensure the principles of impartiality, integrity, and transparency followed by the organization. Furthermore, our Group rejects any form of anti-competitive behavior, and we expect the same from our Suppliers.

Alkemy Group is also committed to ensuring that our Suppliers are in compliance with confidentiality of information regulations and intellectual property rights.

## 4. SUPPLIERS' ENGAGEMENT AND MONITORING

For Alkemy and its subsidiaries, Suppliers' awareness is pivotal for a successful implementation of sustainable practices and to mitigate the risk of possible negative impacts from its external sources. For this reason, we commit to evaluate Suppliers prior to the onboarding.

The Alkemy Group promotes the adoption of the Supplier Code of Conduct by all the Suppliers and its diffusion to all addressees and to all persons who maintain relations with the Group.

The Supplier Code of Conduct is also made available on the corporate website, with a view to spreading and promoting further Alkemy's culture of sustainable procurement practices.

In order to ensure compliance with the provisions set out in this Supplier Code of Conduct, Alkemy and its subsidiaries reserve the right to ask to sign the Supplier Code of Conduct by the Suppliers with which they have a contractual relationship or to sign a specific contractual clause that relates to it. To further monitor their engagement and transparency, Alkemy and its subsidiaries also request their Suppliers to fill and sign an acceptance form in which the Supplier certifies their understanding and commitment to the Code.

## 5. REPORTING OF VIOLATIONS AND MANAGEMENT OF CASES OF NON-COMPLIANCE

In the event of violation with the Code, the recipients are required and encouraged to report the conduct that does not comply with the principles and rules set forth in the Code by using the whistleblowing channel available at [www.alkemy.integrity.complylog.com](http://www.alkemy.integrity.complylog.com). For reporting any alleged breach with reference to the Group Spanish subsidiaries, a dedicated channel has been set up and is available at <https://www.alkemy.es/canal-denuncias/>.

Alkemy Group undertakes to treat each report with confidentiality and to protect the anonymity of the informants, ensuring that they will not be subject to any form of retaliation, in accordance with the legislation in force.

Breaches of this Code make applicable disciplinary sanctions or measures modulated in relation to their seriousness.

## 6. APPROVAL OF THE CODE

This Supplier Code of Conduct is approved by Alkemy's Board of Directors, and it will be the subject of periodic updating based on the results of internal assessments and monitoring actions undertaken.