

CM3

METAL RACKS AND CONSTRUCTIONS



CODE OF CONDUCT FOR SUPPLIERS

Dear suppliers

On behalf of our Companies **CM3 srl**, **CM3 Polska Sp. Z o.o.** and **Karsil Dom Sp. Z o.o.**, hereinafter referred to us **CCK**

We warmly invite you to read this document

Our companies operate mainly on a European level, but import and export products from and around the world, for this reason we work to comply with the rules, laws, and conditions of conduct both civil and moral applied and required in all countries in which our companies operate; consequently we expect the same behavior from our partners and suppliers.

Since the beginning of their history, our companies, Cm3 srl (1973), Cm3 Polska Sp. Z o.o. (2000) and Karsil Dom (2007) have built their image and reputation on transparency, moral integrity, honesty and loyalty, developing and making themselves known for their ethical values in the highest possible way. This declaration of the principles of conduct by our Companies and our Code of Conduct of suppliers are nothing more than the expression of our values, as well as the growing desire to operate with maximum transparency and integrity. In order to increase this common will, as well as the same passion that our companies have been developing in this area for years, we ask you to accompany us on this partnership path, inviting you to take a first step towards this collective member development. The invitation is to sign this Code of Conduct.

This "Code of Conduct" document of our suppliers has been drawn up in order to regulate all those partner companies, future suppliers or entities that already sell or will sell us products, services, etc., through the purchasing agents of our companies. With the viewing and signing of this Code, we expect cooperation at high levels of morality, seriousness and transparency, thus promoting a strong bond of full and mutual trust.

CCK are companies that operate internationally and carry out their activities in various countries around the world. **CCK** Suppliers must comply with the laws, rules and regulations applicable in all countries where **CCK** and its affiliates carry out their activities. In particular, we expect all suppliers to respect the following and require their suppliers to do the same.

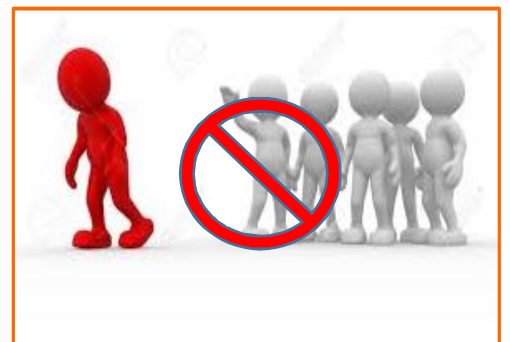
➤ **HUMAN TREATMENT**

Suppliers undertake to treat all workers with dignity and respect and in the same way. Suppliers must under no circumstances subject workers to, or threaten to subject, workers to harsh and inhuman treatment, including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. Disciplinary policies and procedures relating to this requirement must be clearly communicated to their workers.



➤ **NON DISCRIMINATION**

CCK expects from its Suppliers a treatment of respect and dignity for their workers and refrain from any harassment and illegal discrimination. Suppliers must undertake not to discriminate against any person on the basis of sex or sexual orientation, gender identity, color, race, ethnicity, or national origin, age, religion, disability or other medical conditions, genetic information, pregnancy, marital status, political affiliation, union membership, veteran status or on any other basis protected by applicable national or local law.



➤ **FORCED LABOR**

Suppliers must not use or supply products or services from entities associated with forced, tied, contract, involuntary or exploitative work, trafficking or slavery. Involuntary work includes the transportation, custody, recruitment, transfer, reception or hiring of people through threats, force, coercion, kidnapping or fraud for work or services. All work must be undertaken voluntarily and workers must be free to stop using it at any time. There must be no unreasonable restrictions on entry, exit or movement within the structures provided by the company. Suppliers will make every reasonable effort to ensure that their suppliers comply with this requirement.



➤ **CHILD LABOR / YOUNG WORKERS**

Suppliers must not employ workers, directly or indirectly, less than the minimum applicable age specified by applicable laws and regulations. In no case will a Supplier employ any worker under the age of 15. From 15 to 16 years with work not exceeding 6 hours per day. Furthermore, young workers would be well advised not to ask them to carry out activities that are dangerous to their health, safety or morals.



➤ **SALARIES AND WORKING HOUR**

Suppliers must comply with all applicable wage and working time laws, including those relating to minimum wages, overtime hours and other compensation items, and must provide all statutory benefits. Suppliers must not ask employees to work beyond the maximum number of hours allowed by current legislation. For each pay period, Suppliers must provide workers with a timely and understandable salary statement that includes sufficient information for workers to verify that they have received accurate compensation for the work done.



➤ **FREEDOM OF ASSOCIATION**

Suppliers must respect workers' rights to associate freely and in accordance with existing local laws and without discrimination, intimidation or harassment, as well as respect the right of workers to refrain from such activities. Workers and / or their representatives must be able to communicate openly and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or harassment.



➤ **CONFIDENTIALITY**

Suppliers must protect the confidential data entrusted to them by **CCK**, its affiliates, customers or suppliers. Confidential data may be used and disclosed only as authorized by **CCK**. Confidential data includes all commercial information of **CCK**, its customers or suppliers not generally known to the public.



➤ **INTELLECTUAL PROPERTY RIGHTS**

Suppliers are required to respect and not violate the intellectual property rights of third parties, including patents, trademarks, copyrights and other property rights.



➤ **INTERNATIONAL ACTIVITIES**

Suppliers must comply with all import laws, including all applicable labeling requirements, customs duties and all other laws relating to their international business activities.



➤ **MINERALS FROM CONFLICT AREAS**

Based on its Conflict Minerals Policy, **CCK** undertakes to find minerals only from foundries or refineries that do not belong to or are located in conflict areas and expects the same commitment from Suppliers. Upon **CCK**'s request, Suppliers are required to determine whether any products supplied by Suppliers contain tin, tantalum, tungsten, gold or any other material designated under the applicable Securities and Exchange Commission rules as "minerals from conflict areas". The Supplier must also take the necessary measures and provide such additional information in the format requested by **CCK** to the extent necessary in order to allow **CCK** to be or remain compliant with laws, rules and regulations regarding minerals from conflict areas.



➤ **FAIR AGREEMENTS AND COMPETITION LAWS**

We are expected that Suppliers will behave fairly with **CCK** employees and their other business partners and should not take unfair advantage through manipulation, concealment, abuse, misrepresentation of material facts or any other unfair conduct. The Supplier will not engage in collusive offers, price fixing, price discrimination or other unfair commercial practices in violation of the applicable antitrust and competition laws. The Supplier will comply with fairness standards in advertising, sales and competition.



➤ **GYFT AND PAYMENTS NOT APPROPRIATE**

Suppliers must work against corruption in all its forms and it is forbidden to commit acts of corruption, extortion or misappropriation. Suppliers must comply with all applicable anti-corruption laws and regulations of the countries in which they operate, such as the United States Foreign Corrupt Practices Act and, where applicable, the Anti-Bribery Act in the United Kingdom, the OECD Anti-Corruption Convention and any other international anti-corruption convention. Suppliers cannot offer or accept bribes or use other means to obtain an undue or improper advantage. Bribes, facilitation payments and similar payments to government officials or **CCK** employees or agents acting on behalf of the **CCK** are prohibited. **CCK** employees cannot accept gifts and, in this case, they will be at the management's discretion, who will have to verify their size and



value. No type of gift / gift examined before by the Management can be delivered or delivered personally or in a different company location. For business lunches and entertainment, if they are appropriate to foster legitimate business relationships, these expenses cannot be excessive in nature and in any case always accepted first by the Management.

➤ **ENVIRONMENTAL HEALTH AND SAFETY LAWS**

Suppliers must strive to be more respectful of the environment and promote an improvement in health and safety in carrying out their business. Suppliers must comply with all applicable environmental, health and safety laws and regulations, offer workers a healthy and safe working environment, provide the necessary medical care and implement corrective actions to eliminate the causes of injury. Suppliers must reduce the impact on the environment of their activities through the conservation of natural resources, reduced energy consumption and greenhouse gas emissions, waste reduction, responsible management of chemicals and other means. Suppliers must be able to develop more environmentally efficient technologies. When a Supplier, its affiliates, agents or representatives are present at a **CCK** location or a **CCK** customer's location on behalf of **CCK**, the Supplier will need to comply with the **CCK** policies and applicable site requirements.



➤ **VERIFICATION CONFORMITY**

Suppliers must establish and maintain a process of ensuring compliance with the **CCK** Supplier Code of Conduct. This includes communicating the requirements of this Code to all employees, affiliates, agents and subcontractors of the Supplier. The Supplier must keep all the documentation necessary to demonstrate compliance with the **CCK** Supplier Code of Conduct. Upon **CCK**'s request, the Supplier must be ready to provide **CCK** or its affiliates with access to such documentation.



Any violation of the Code of Conduct of **CCK** suppliers may result in the immediate termination of the relationship between Supplier and **CCK**. To report any violations of this Code, send a report to **CCK** at laudani.carmelo@cm3polska.com

SIGNATURE AND STAMP OF THE SUPPLIER
