



# Supplier Code of Conduct



## Introduction

This Supplier code of Conduct lay out the minimum requirements and specify the core principles STAAMP expects all of its business partners to adhere to when engaging in business with any entity that is part of or affiliated with STAAMP group ("STAAMP").

The requirements and core principles laid out herein conform to national and international laws, principles and conventions, such as the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and relevant conventions of the International Labour Organization (ILO).

Business partners are all natural or legal persons from whom STAAMP procures supplies or services. For instance, business partners include but are not limited to suppliers, customers, consultants, or other providers of goods and services.

### **STAAMP Business Partners must:**

- Conduct business in accordance with this Supplier Code of Conduct
- Follow STAAMP ethic code, anticorruption code and all STAAMP policies



# Anticorruption code & Purchasing guidelines

STAAMP does not tolerate any form of bribery or any business practices that could create the impression of improper manipulation or influence.

Suppliers must comply with anti-corruption laws, directives and regulations that govern operations in the countries in which they operate. Suppliers must refrain from offering or making any improper payments or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like customs clearance, even in locations where such activity may not violate local law. Suppliers are expected to exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

Gifts or any personal favors are not allowed if they could influence recipient's decisions.

Suppliers must not offer any illegal payments to, or receive any illegal payments from any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

Details on STAAMP documents PQ06, PQ06\_1 available on [www.staamp.it](http://www.staamp.it)



## Fair and Free Markets

STAAMP champions the principles of fair and free competition as a fundamental component of the market economy.

STAAMP does not fix prices or bids with their competitors and refrain from participating in a cartel.

Our business partners must ensure that they adhere to the applicable antitrust and competition laws in all aspects of their business activities. STAAMP expects all of its business partners to refrain from engaging in any act that is aimed at or results in the hindrance, restriction, or distortion of free and fair competition.

## Import & Export

Without exception, STAAMP business partners are expected to strictly follow all applicable international trade regulations and adhere to the rules and regulations governing import and export controls and/or consents, where necessary, including any applicable economic embargos.



# Human Rights and Social Responsibility

For STAAMP, respect for human rights is an essential value on which corporate culture and strategy are based. Staamp is committed to adopting, implementing and diffuse the principles relating to the protection and safeguarding of human rights in accordance the United Nations Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights (UN) and the fundamental conventions of the International Labor Organization (ILO).

STAAMP prevents and repudiates any form of discrimination and violence, such as forced child labour, promotes freedom of association and collective bargaining, adopts adequate health and safety conditions compliant with work activities carried out in compliance with equal opportunities.

Business partners must adhere to and implement all applicable legal requirements regarding a safe and healthy working environment. STAAMP requires business partners to ensure that they and their employees take measures to ensure compliance with these laws. STAAMP cares for the health & safety of its employees and is committed to working to eliminate occupational accidents, and we expect our business partners to do the same.

Business partners should be aware of their social responsibility towards their employees and ensure fair and appropriate remuneration and working hours in accordance with applicable laws and should also support the development of their employees.



## Environmental Protection

For STAAMP, responsibility toward the environment means protecting the finite resources of nature. Therefore, the careful and efficient use of resources is of the utmost importance to STAAMP. Suppliers shall comply with all national and international environmental standards and laws that apply to its location of business. STAAMP also expects the supplier to refrain harmful changes to the soil, water and air pollution, harmful noise emissions, and excess water consumption that significantly impair the natural foundations for the cultivation and the production of food, prevent people from accessing safe drinking water, impair or inhibit access to sanitary facilities, or are harmful to health.

STAAMP requires that the supplier shall also make continuous efforts to reduce their environmental pollution and risks and improve environmental protection within their own sphere of influence on an ongoing basis. The use of resources (in particular energy, water, raw materials and/or (primary) materials) and the environmental impacts (in particular emissions, pollutants, waste) are to be consistently minimized. Staamp has the objective of using certified ISO 14001 suppliers or having a voluntary planning to obtain this certification. The supplier shall appoint a competent body for environmental sustainability and create a policy on environment and train its employees accordingly

## Product Compliance

STAAMP produces technical components for sectors where strict dimensional, functional and reliability requirements are required. STAAMP committed itself to the highest product and quality standards supplying products that are safe and comply with all applicable laws and regulations.

STAAMP requires its business partners to the same high standards and expects them to also deliver fully compliant products of the same high level of quality and safety. STAAMP does not tolerate illegal or unethical conduct by its business partners in respect of their products. Supplier must establish and implement a process to avoid and detect counterfeiting, mitigate its effects and eliminate counterfeit materials.



# Handling of Information and Protection of Data

When conducting business with STAAMP, business partners must ensure that sensitive business, technical and financial information, know-how and trade secrets are appropriately protected with regards to confidentiality, availability and integrity and not disseminated without the appropriate authorization or in accordance with applicable legal requirements.

Staamp has the objective of using business partners which can prove a mature Information Security Management System according to ISO27001 or TISAX and have to protect rights to privacy, in conformance with the applicable law in all business processes, to avoid data breaches and cyber security attacks.

Without these prerequisites, Staamp will require to fulfil a specific questionnaire for the supplier's information security management system qualification.



# Whistleblowing

Trust and cooperation are the basis of the relationship between STAAMP and STAAMP's business partners. STAAMP expects its business partners to report any potential legal violations of any European and/or local laws that might have an impact on Staamp integrity.

Such violation can be notified to [whistleblowing@staamp.it](mailto:whistleblowing@staamp.it)

STAAMP business partners must have appropriate systems and controls in place in accordance with EU directive 2019/1937