DATE	DESCRIPTION OF CHANGES		
22/10/2026	Integration following SAQ5.0 questionnaire requests		
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1. General ethical principles and standards

This document expresses the commitments and ethical responsibilities in the conduct of business and corporate activities undertaken by **F.LLI MARTINELLI** towards its Suppliers. The Code of Ethics is binding for the conduct of all Suppliers and/or external collaborators of **F.LLI MARTINELLI.** This commitment also applies to consultants, suppliers and anyone who has relations with **F.LLI MARTINELLI.** The company will not start or continue any relationship with those who do not intend to align themselves with this principle.

F.LLI MARTINELLI is convinced that honesty, sincerity and loyalty are necessary to build correct and lasting relationships. All aspects of our work must be based on the highest ethical standards. **F.LLI MARTINELLI** has a business management system in compliance with the requirements of IATF 16949 which describes the activities, processes, procedures, responsibilities and company organization in accordance with which employees must carry out their activities.

Violations of the law determine the imposition, by the competent Judicial Authority, of sanctions related to the specific violation committed in the specific case and may also determine the interdiction, on the part of **F.LLI MARTINELLI**, of the exercise of its activities both in the private and in the public sector and expose **F.LLI MARTINELLI** to claims for compensation for damages related to the same violation of the law, with obvious negative repercussions not only at an economic level but also at the level of image and reliability in its operating market.

The Code of Ethics is an integral part of the Business Management System adopted by **F.LLI MARTINELLI.**

Ethical conduct means respecting the rules and provisions of the law. **F.LLI MARTINELLI** is committed to enhancing the professionalism of all the people whose skills it uses to pursue the goal of maximum customer satisfaction through the guarantee of reliability over time of the products and services provided, in strict compliance with all regulations, also and above all in terms of the environment, safety and health in the workplace. **F.LLI MARTINELLI** makes every effort and commitment to ensure that its managers, employees and collaborators behave in an ethically correct manner in the execution and performance of all commercial and corporate activities within their competence and entrusted to them. **Ethical conduct** also means identifying and respecting the spirit of internal needs, avoiding any attempt to circumvent them.

Therefore, the GENERAL ETHICAL PRINCIPLES to which suppliers must also comply are:

VALUE OF THE PERSON: THE VALUE OF THE PERSON REPRESENTS A FUNDAMENTAL PRINCIPLE AT THE CENTER OF THE DAILY ACTIONS OF **F.LLI MARTINELLI**, which is committed to using listening and dialogue as tools for continuous improvement both with respect to the proposals for solutions to customers and with respect to the enhancement of the personality and competence of its employees and collaborators. The value of the person is managed starting from the selection and recruitment of personnel without any discrimination and also passes through the correct management of salaries and company benefits.

HUMAN RIGHTS: The primary value pursued by the Company is full respect for human rights, the implementation of which is promoted within its sphere of influence. **F.LLI MARTINELLI** undertakes not to implement, even indirectly, any abuse or violation of human rights (also understood as racism, xenophobia, slavery, harassment and discrimination) also as a guarantee of protection of diversity, equity, inclusion and protection of minority rights.

2. Recipients of the Code of Ethics

F.LLI MARTINELLI makes use of competent suppliers, in a relationship of indispensable and reciprocal loyalty, transparency and collaboration.

The recipients of this Code of Ethics for Suppliers are all external collaborators and consultants and suppliers who are required without exception to comply with this Code of Ethics in the conduct of business and commercial negotiations.

Each supplier is required to comply with this Code of Ethics, which is an integral part of the contractual documentation with **F.LLI MARTINELLI.** Any violations by the Supplier will lead to the evaluation of measures that may lead to both termination and the possible request for economic and image damages depending on the offence.

3. The competition

F.LLI MARTINELLI believes that fair competition is a fundamental element for the common well-being; collaboration and comparison are an important opportunity to improve its quality standard; on the basis of this principle, therefore, it is forbidden to use practices aimed at threatening one's competitors or practices aimed at gaining an advantage through the purchase of products without having provided for all tax obligations.

4. Corruption

F.LLI MARTINELLI does not tolerate corruption. Influencing the decisions that can be taken by public or private entities, promising or granting benefits and utilities of any kind, is prohibited by law and is criminally sanctioned. **F.LLI MARTINELLI** is committed to fighting corruption and preventing any behavior that may even give the slightest impression of corrupt action, and in this perspective guarantees transparency in all activities and practices.

F.LLI MARTINELLI acts decisively wherever there is a suspicion of collusion or corruption, adopting all the most appropriate measures. Gifts, gifts and other benefits, even if only promised, must be allowed only when they are adequately authorized and documented, of modest value and in any case such that they cannot be interpreted by third parties as aimed at acquiring any type of advantage in an improper or illicit way. In any case, gifts, gifts and other benefits must never in any way be intended or aimed at influencing or rewarding an act proper to the recipient's office.

5. The Workplace, the protection of Health and Safety, child and female labour

F.LLI MARTINELLI is committed to safety both internally and at its supplier base; therefore, suppliers are required to comply with the requirements on safety, compliance with working hours to be maintained, child labour and female labour. In addition, it is required to correctly

manage risk analyses in the field of safety in the workplace and in particular, for example, noise risk, Atex risk, risk and correct use of chemicals. Proper management of personal protective equipment and the management of near misses.
Respect for the right to National Bargaining and the prohibition of abuse and harassment of personnel are also required.

6. Conflict of interest

A conflict of interest is generally any activity that is or appears to be in contrast with the best business interests of **F.LLI MARTINELLI.** Any conflict, even if only apparent, must be immediately communicated to **F.LLI MARTINELLI.**

7. Conflict Minerals

As part of the promotion of a **sustainable supply chain**, F.LLI MARTINELLI **requires Suppliers to properly manage the Materials, also from the point of view of the places of supply (e.g. use of minerals that do not come from war zones). Where applicable, the Supplier is required to send updates to the reports available on the** website annually www.responsiblemineralsinitiative.org/reporting-temlpates/

8. Resource conservation, resource efficiency and environmental protection

F.LLI MARTINELLI places the issue of the environment at the top of the company's principles. Therefore, compliance with environmental legal requirements by all suppliers is considered essential. In addition, the utmost attention is required in the field of environmental management aimedat improving air quality, reducing greenhouse gas emissions and reducing and managing energy consumption (gas, electricity and water) and decarbonization.
F.LLI MARTINELLI expects suppliers to respect the rights of ownership and possession of land and soil so as not to compromise the supply or quality of resources for local communities.
F.LLI MARTINELLI expects suppliers to make a commitment to prevent deforestation and environmental degradation. A commitment is required to comply with regulations to protect the forest heritage, biodiversity and ecosystem in order to ensure respect for the Flora and Fauna of the various territories of reference for the Suppliers.

9. The management of data, information and intellectual property

Suppliers are required to properly manage information and data relating to the relationship between **F.LLI MARTINELLI** and Suppliers. In addition, compliance with any NDAs with **F.LLI MARTINELLI is** required**. Obviously, management is extended to the intellectual property of Customers and** F.LLI MARTINELLI.

10. Management of commercial relations, economic sanctions and traceability

Suppliers are required to manage their business relations correctly and to pay attention not to have relations with Customers/Suppliers on the black-lists or subject to embargoes, with particular reference to the https://sanctionsmap.eu/ website.
Proper management of payments and the relative traceability of financial flows are also required.

11. Implementation, supervision and control systems

According to the rules included in this code, all Collaborators/Suppliers are responsible for their actions and conduct. Furthermore, since the top management of **F.LLI MARTINELLI** is responsible as they direct the actions of others and are an example for employees, these, together with employees, collaborators and suppliers must be well aware of the values expressed in this document.
Failure to comply with this Code of Ethics will result in the immediate termination of existing contractual relationships, without prejudice to the right to compensation for damages. Suppliers are required to properly manage reports of wrongdoing and protect against retaliation against whistleblowers in compliance with current legislation on whistleblowing.

F.LLI MARTINELLI encourages its suppliers to improve their environmental performance.

Signature
for approval F.lli Martinelli

