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# CODE OF CONDUCT FOR SUPPLIERS



## GRINDING TECHNOLOGY SRL

SEDE LEGALE: S.S. VALLE BORMIDA NORD 4 – 15016 CASSINE  
SEDE OPERATIVA: S.S. VALLE BORMIDA NORD 4 – 15016 CASSINE

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HSQE Manager: Marco Lonati

*Marco Lonati*

CEO: Davide Cucinella

*Davide Cucinella*

DATA: 12/04/2024

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## Code of Conduct for Suppliers and contractors

Following the implementation of a Management System for quality, environment, health and safety in the workplace in accordance with ISO9001, ISO14001, ISO45001 and our Code of Ethics, suppliers, its employees, agents and Subcontractors are required to scrupulously comply with behavioural standards inspired by the principles of ethics, sustainability and regulatory compliance.

### Supplier's commitments

#### *Human rights*

The Supplier agrees to comply with human and labour rights conventions including specific ones on children, discrimination, harassments, forced labour and respect for diversity.

The Supplier declares to comply with applicable collective bargaining agreements provisions (especially about working hours, salaries, freedom of association, women rights etc.) regarding immigration regulations, regulations on the status of foreigners, and requirements regarding the prevention of irregular labour.

The Supplier undertakes to comply with the rules which ensure adequate levels of health and safety for workers, collaborators and those involved in the supply and to cooperate in the drafting of joint documents on health and safety in the workplace.

#### *Health & Safety*

The Supplier is committed to respect all designated rules to guarantee suitable health and safety levels for its workers.

Especially:

- It analyses all the possible risks in its manufacturing area
- It puts in place all the suitable measures to minimize risks
- It informs all the workers of the possible risks present on the workplace and all the possible preventive and corrective actions to put in place
- It supplies personal protective equipment and protective and suitable clothes
- It puts in place suitable fire-extinguish and first aid measures (emergency and evacuation plans, fire-extinguish and emergency trained teams)

#### *Environment*

The supplier is committed to work in compliance with the environment, checking its energetic efficiency and its environmental impact ("carbon footprint") and adopting suitable behaviours for a responsible use of natural resources (water, air, minerals imported from war zones, non-renewable raw material)

The supplier is committed to adopt suitable solutions to reduce dangerous emissions for the wealth and for the environment, included greenhouse gas emissions.

The supplier is committed to take suitable solutions to avoid the use of dangerous substances or material for the wealth and for the environment (carcinogenic, mutagenic or reprotoxic substances), following applicable laws.

The supplier is committed to notify possible substances, material or complex products which may contain extremely dangerous components (SVHC - Substances of Very High Concern) in a percentage upper than 0,1%.

#### *Waste management*


The supplier is committed to manage waste in a suitable and conform way following current laws about waste disposal, obviously preferring recycle and reuse to refusal disposal.

#### *Safety and quality of the supplied product*

The Supplier undertakes to provide:

- products and/or services that comply with current legislative provisions;
- products with all the labelling and declarations of conformity required by the above provisions or required by GRINDING TECHNOLOGY (e.g.: all product data sheets and user and maintenance manuals). These documents shall be prepared in accordance with the relevant technical standards and shall also contain the necessary environmental information including decommissioning aspects of the products.

The Supplier agrees to supply products of which it has complete availability and ownership of trademarks, patents or intellectual property rights in general, including copyright aspects of software.

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## **Confidentiality**

The Supplier undertakes to keep strictly confidential all information, news and data of which it becomes aware during or in connection with any contractual activity and/or business relationship with GRINDING TECHNOLOGY. Therefore, information received by JOBS shall be considered confidential and shall be used only for the performance of its activities.


The Supplier shall be careful to prevent such information from being used to promote or favour its own or others' interests.

## **Company Ethics**

Grinding Technology is committed to operate in ethical way in the field of:

- Anti- corruption - rejection of any form of corruption and commitment that its workers or salesmen don't allow, offer or accept bribes or donations or other benefits with the aim of ease the business.
- Import-export control and economic sanctions- respect of laws in force in the field of import-export goods, services and information
- Anti-money laundering - respect of laws in force against money laundering in the field of business relationships
- Fair competition
- Whistleblowing and equal treatment
- Protection and safeguard of personal data
- Respect of UE laws about minerals and metals import which may contain tin, tungsten, tantalum and gold.

The Code of Ethics is available in its current version on GRINDING TECHNOLOGY website <https://www.grindingtechnology.eu/politica-della-qualita/>

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## Code of conduct for suppliers who provide their services at the company's site or at Grinding Technology customers' plants

In addition to the above, which applies to all Suppliers, Suppliers performing their activities at the company's site or at GRINDING TECHNOLOGY customers' sites must comply with the following regulations.

The Supplier undertakes to scrupulously comply with the obligations of the Law and the safety regulations set forth in its own risk assessment (Safety Plan) and/or interference risk assessment (DUVRI) prepared, when necessary, by GRINDING TECHNOLOGY with the cooperation of the Supplier.

The Supplier undertakes to provide, as an example but not in an exhaustive way, the following documents: registration with the chamber of commerce or equivalent document, authorization to carry out the activities, DURC, extract of the risk assessment for the activities of reference or safety plan, RCT insurance policy and any other document in accordance with the provisions of Article 26 of Legislative Decree no. 81/08 and following amendments.

The Supplier undertakes to provide its own declaration of technical-professional suitability in accordance with art.26 paragraph 1 letter a) point 1 of Legislative Decree no. 81/08 and that it is not subject of suspension or interdiction measures under art.14, paragraph 1, Legislative Decree no. 81/08.

The Supplier undertakes to use its own equipment, tools, machines, facilities, provisional works, etc., in compliance with current laws on safety and hygiene at work and in accordance with risk prevention regulations; the use of GRINDING TECHNOLOGY equipment must be authorized by GRINDING TECHNOLOGY and regulated through a loan for use.

The Supplier agrees to provide GRINDING TECHNOLOGY with a list of personnel who will work at GRINDING TECHNOLOGY or on behalf of GRINDING TECHNOLOGY at customers' sites; such personnel shall be regularly hired, in compliance with the health surveillance required by their job description and shall have attended all courses related to safety and the use of the equipment provided for the performance of their work. Certificates of capability and attestations shall be provided to GRINDING TECHNOLOGY upon request.

The Supplier agrees to provide its personnel with appropriate identification badges in accordance with Article 18, paragraph 1, letter u), Legislative Decree 81/08.

The Supplier undertakes to provide its personnel with the most appropriate personal protective equipment (PPE).

The Supplier undertakes not to subcontract the activities commissioned by GRINDING TECHNOLOGY without prior authorization.

The Supplier undertakes to cooperate, if necessary, in the drafting of DUVRI, in accordance with the provisions of Legislative Decree No. 81/08 and following amendments.

The Supplier undertakes to comply with the environmental procedures in place at GRINDING TECHNOLOGY site.

The Supplier undertakes to comply with all safety procedures in place at GRINDING TECHNOLOGY site.

The Supplier also undertakes, according to its possibilities, to cooperate in the reduction of environmental impacts.

The Supplier agrees to comply with all quality standards and procedures of GRINDING TECHNOLOGY operating process, as well as the completion of GRINDING TECHNOLOGY forms and/or records.

Each employee shall take care of his own safety and health and that of other persons in the workplace, on whom the effects of his actions or omissions may fall, in accordance with his training and the instructions and means provided by the Employer.

The GRINDING TECHNOLOGY employer undertakes to coordinate interventions aimed at the protection and prevention of risks due to interference between works of different companies involved in the execution of the activities.

## Information on risks

	PRODUCTION	OFFICES	EXTERNAL
Investments	yes	no	yes
Suspended loads	yes	no	no
Falling materials from height	yes	no	no
Material handling by lifting and transporting equipment	yes	no	yes
Presence of hazardous substances	yes	no	no
Presence of flammable substances	no	no	no
Spillage of liquids	no	no	no
Slippery materials on floor	yes	no	yes
Projection of sparks	no	no	no
Projection of chips or splinters	yes	no	no
High-pressure equipment or containers	yes	no	no
Presence of electrical cables on floor	yes	yes	no
Presence of flexible piping on floor	yes	no	no
Underground water pipes	no	no	no
Walled electrical cables	no	no	no
Overhead electrical cables	no	no	no
Flammable gas or liquid piping	no	no	no
Glare caused by arc welding activities	no	no	no
Vibrations	yes	no	no
Noise zones	yes	no	no
High temperatures	no	no	no
Presence of electromagnetic fields	yes	no	no
Presence of dust	no	no	no

## Health and safety in workplaces

Suppliers carrying out their activities at the Company premises must comply with the following provisions:


- register for access at the reception desk and then be accompanied by the contact person to the GRINDING TECHNOLOGY area where the pertaining operations will take place.
- request the authorisation of the sector supervisor to leave the area in which operations are taking place.
- take the necessary measures to avoid incurring unnecessary risks to himself and to other persons present at the workplace, on whom the effects of his actions or omissions may fall.
- become acquainted with the emergency plan,
- become informed of the specific risks concerning the area in which works are to be carried out,
- observe all warning notices and comply with the obligations imposed,
- properly use machinery, equipment, tools, hazardous substances and preparations, transport means and other work equipment, and safety devices.
- properly use the personal protection equipment,
- do not use GRINDING TECHNOLOGY equipment or machinery, without having obtained a loan for use or authorization from the supervisor, without a prior joint assessment of the condition of the equipment itself and without prior training certified.
- immediately report to the supervisor lacks of equipment and devices, as well as any other hazardous conditions of which they become aware.
- suspend works and notify the specific supervisor in case of risk situations.
- keep the work area clean and put away materials that could be a source of danger to third parties as well.
- tidy up tools on concluding activities and disconnect the power plugs from portable electrical equipment.
- never obstruct transit or emergency paths.
- refrain from smoking in the whole site.

## Hot work and use of naked flames

Hot work and the use of naked flames are prohibited.

If such operations are absolutely necessary, it is mandatory:

- to request relevant authorisation,
- to cordon off the area with barriers or other, in order to prevent access by persons not involved in the work,
- to check that there are no combustible materials in the proximity at least 10m away,
- to provide a 6kg portable powder extinguisher.

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## ***Dangerous substances***

Suppliers intending to introduce dangerous substances (identified with labels carrying danger symbols) on the premises of the Company, must:

- provide RSPP (Responsible for Prevention and Protection Service) with a list of the dangerous substances they intend making use of at the Company,
- make the safety charts relevant to said substances available to RSPP,
- use the dangerous substances in observance of the provisions listed in the safety charts,
- take care that no containers with dangerous substances are left available to third parties,
- take care that no empty containers, even if clean, are left unattended,
- take care that no dangerous substances are spilled or that environmental accidents could be caused,
- intervene immediately to curb any spillages or limit the consequences of any environmental accidents, notifying the reference supervisor.

## ***Waste***

Because of the nature of activities carried out at the Company site, Suppliers that generate wastes must:

- be totally responsible for attending to its disposal or making arrangements with GRINDING TECHNOLOGY to undertake the most suitable waste disposal.
- refrain from smoking or using naked flames in the vicinity of containers for the temporary collection of waste.
- refrain from smoking or using naked flames in the ecological disposal areas or in proximity of these ones.
- never mix different types of wastes and label each type of waste.

## ***Road circulation***

Suppliers accessing to the GRINDING TECHNOLOGY site with their own means of transport must comply with the following provisions:

- engines must not be kept running in the yard during loading and unloading operations, inside the premises.
- the speed limit of 10 Km/h must never be exceeded in the yard of GRINDING TECHNOLOGY