

BRANDANI®

ITALIAN STYLE

CODE OF  
CONDUCT  
SUPPLIERS

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October 2022

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## SUPPLIER CODE OF CONDUCT

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### PURPOSE

In BRANDANI GIFT GROUP, our mission is to connect men and nature. We believe in positive change and in taking responsibility for the impact we have on the planet and the people who populate it.

We are committed to managing and developing our business responsibly and sustainably. We operate in the spirit and letter of the law, maintaining high ethical standards wherever we operate.

As such, BRANDANI GIFT GROUP has for many years implemented the Code of Business Conduct which defines the fundamental principles in important sectors such as human and labor rights, environmental protection, the fight against corruption and the ethical practice applicable to both internal and external business partners.

This Supplier Code of Conduct (hereinafter referred to as the "Code") derives from the Code of Business Conduct and the CSR (Corporate Social Responsibility) principles of the BRANDANI GIFT GROUP, its purpose is to outline the global standards and expectations that must be adopted by all of our Suppliers.

BRANDANI GIFT GROUP suppliers, contractors, subcontractors, consultants and vendors and other business partners (hereinafter referred to as "Suppliers") are an integral part of our business and mission.

We ask our Suppliers to share our values and to promote the application of these high standards both within their organization and throughout their supply chain. Suppliers are strongly encouraged to ensure that their supply chains comply with the standards of this Code or similar standards whose purpose is to uplift mankind and to ennoble his life.

With a broad global supplier base, these requirements present us with the opportunity to drive real change in the world.

Thank you for supporting our mission and being part of the future of responsible business.

## THE COMMITMENT OF OUR SUPPLIERS

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### 1. COMPLY WITH LAWS AND REGULATIONS

It is essential for a socially and environmentally responsible supply chain that all suppliers behave fairly, legally and ethically.

Our suppliers are required to comply with all relevant and applicable laws, rules and regulations and to comply with the standards (eg ISO) of the business sector in which they operate and the country to which they belong.

### 2. PROHIBIT ANY FORM OF FORCED LABOR AND CHILD LABOR

Our suppliers must be committed in guaranteeing the human rights of workers and treating them with dignity and respect. Workers mean direct employees, temporary workers, migrant workers and any other person who provides work and employment services to the supplier.

#### 2.A. CHILD LABOR

Our Suppliers must prohibit any form of child labor. No person under the age of 15 (or 14 if permitted by local law) should be employed. Minor workers (16-17 years) cannot carry out work which, by its nature or by the circumstances in which it is carried out, could compromise their health, safety or morality.

#### 2.B. Trafficking in human beings, including forced or compulsory labor

Our Suppliers are required to prohibit any form of forced or compulsory labor. Forced labor, including bondage, bondage (including debt easement), involuntary prison labor, or other forms of forced labor shall not be used during the Supplier's entire operational process.

Our Suppliers are required to monitor any third party that assists them in the selection or hiring of employees, in order to ensure that those seeking work at their location are not forced to work by force, deception, intimidation, coercion or as punishment for having had or expressed political / religious views.

All work must be done out of free will. Workers must be allowed to move freely, to leave the workplace at the end of the shift and be free to leave their employer with reasonable notice and in accordance with applicable law.

### 3. GUARANTEE HEALTH AND SAFETY CONDITIONS

Our Suppliers must provide their workers, free of charge, with a safe and healthy workplace, as well as personal protective equipment to avoid accidents and injuries arising, connected or occurring in the course of work or as a consequence of the operation of the employers' plants.

Our Suppliers must take a proactive approach to health and safety by implementing policies, systems and training aimed at preventing accidents, injuries, to protect and promote the health of workers.

Our Suppliers will have procedures in place to deal with emergencies including, but not limited to, fires, accidents and natural disasters.

## 4.DEVELOP EMPLOYMENT PRACTICES

Our Suppliers must encourage the development of employment and treat each employee with respect and dignity.

### 4.A. HARASSMENT

Our Suppliers must take reasonable steps to ensure that their employees are provided with a work environment free from physical, psychological, verbal or any other type of harassment or other abusive conduct or practice (e.g. pregnancy or medical testing or termination of pregnancy as part of hiring or discrimination based on sex or religion).

### 4.B. NON-DISCRIMINATION

Our Suppliers must encourage equal employment opportunities to employees and candidates for positions without discrimination.

### 4 C. Minimum wage and benefits

Our Suppliers must comply with all applicable national laws and regulations in their country regarding wages, working hours, overtime and benefits.

Our Suppliers must guarantee their employees voluntary payment of at least a minimum wage and overtime bonuses.

Our Suppliers will work to progressively raise employee living standards through improved pay systems, benefits, welfare programs and other additional services.

Employers must pay wages equal to or greater than a minimum wage or the appropriate prevailing wage, whichever is higher, comply with all statutory wage obligations and provide all statutory fringe benefits and / or from the contract.

Employees of our Suppliers are entitled to at least one rest day out of seven and must be able to take reasonable breaks during work and sufficient rest periods between shifts.

Our Suppliers will grant all labor rights to employees as required by national law. The employment of temporary workers must comply with the relevant national employment laws.

### 4.D. Social dialogue

Our Suppliers must respect the rights of their workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, sanction, interference or retaliation.

Our Suppliers must promote non-discriminatory practices towards employee representatives.

Our Suppliers must recognize and respect the rights of their workers to exercise their legitimate rights of free association, including membership or non-membership of any association of their choice.

### 4.E. Employment relationship

Our Suppliers must adopt and comply with working rules and conditions that respect their workers and, at the very least, safeguard their rights under the national and international labor and social security laws and regulations of the country in which their workers are employed.

Our Suppliers are expected to provide their employees with avenues to raise legal or ethical issues or concerns without fear of retaliation. Suppliers must also take actions to prevent, identify and correct any retaliatory actions.

Our Suppliers will promote professional development opportunities for their employees in order to encourage the development of skills and knowledge.

## 5. PROMOTE THE PROTECTION OF INFORMATION

### 5.A. Confidential / Proprietary Information

Our Suppliers must handle sensitive information correctly, including confidential, proprietary and personal information. The information must not be used for any purpose other than the commercial purpose for which it was provided, except with the prior permission of the owner of the information.

### 5.B. Intellectual property

Our Suppliers must comply with all applicable laws governing intellectual property rights claims, including protection against disclosure, patents, copyrights and trademarks.

### 5.C. Information security

Our Suppliers must protect third party confidential and proprietary information, including personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate security procedures as required by law and / or to contract.

## 6. GUARANTEE ON TRANSPARENCY OF INFORMATION

Each Supplier must guarantee that the data and information that they will be asked to provide to BRANDANI GIFT GROUP in relation to compliance with this Code, regardless of their nature (technical, commercial or other) and format (digital, printed or oral) are accurate, complete, transparent, updated and shared promptly.

## 7. ACT IN RESPECT OF THE ENVIRONMENT

- Our Suppliers will work systematically to prevent, continuously monitor, minimize and remedy the negative environmental impacts (air, noise, soil, waste and water disposal) of their activities, products and services through a proactive approach and the management of their environmental responsibilities.
- Our Suppliers must work actively to prevent environmental accidents and ensure the ability to react appropriately to such events with adequate preventive and corrective measures.
- Suppliers must maintain written environmental policies and agree to be monitored separately for environmental responsibility.

## 8. CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

- Our Suppliers must comply with international protocols on biodiversity conservation.
- Our Suppliers must not use banned agrochemicals that have a critical impact on local biodiversity and must comply with the Stockholm Convention.
- Suppliers must be careful not to have a negative impact on protected areas or species.
- Our Suppliers must use resources efficiently, favoring the eco-design of products and services, constantly aiming for the optimized use of raw materials, energy, water and other resources.
- Our Suppliers must understand the link that may exist between their business and biodiversity and, where appropriate, take action to safeguard it.

## 9. GUARANTEE COMPANY ETHICS

We expect our Suppliers to conduct their business with honesty and integrity and demonstrate the highest standards of business ethics.

### 9.A. Fair Business Practices - Anti-corruption

Our Suppliers must comply with all applicable anti-corruption laws, directives and regulations, including avoiding commercial concussion in all countries in which they operate.

Our Suppliers must not engage in concussion, corruption or other unethical or illegal practices, whether in dealing with government officials, political parties or others, including individuals in the private sector. Suppliers must have adequate internal controls in place to safeguard these practices.

Our Suppliers must exercise due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, clearing agreements and the hiring of intermediaries such as agents or consultants.

The exchange of commercial courtesies cannot be used to obtain an undue competitive advantage or establish a commercial, financial or other relationship with the BRANDANI GIFT GROUP.

### 9.B. Business gifts and courtesies

We recognize that, within our supply chains, there are many different national cultures, with their own laws, norms and traditions that we must recognize and respect. In certain countries and cultural contexts, a quality business relationship can result in an exchange of low value business gifts and courtesies. In such circumstances, the principle of full transparency must be applied and the employee receiving the gift / business courtesy must inform their supervisor and these must be exchanged outside of any negotiation period.

### 9.C Illicit Payments

Our Suppliers must not offer improper payments to or receive improper payments from any customer, supplier, agent, representative or others. It must be forbidden to receive, pay and / or promise sums of money or anything of value, directly or indirectly, intended to exercise undue influence or an improper advantage.

### 9.D. Fraud and deception

Our Suppliers must not seek to obtain any advantage of any kind by acting fraudulently, deceptively or by making false claims, or by allowing third parties to do so. This includes fraud or theft against the company, a customer or a third party, and any type of misappropriation of property.

### 9.E. Competition and Anti-Trust

Our suppliers must not enter into contracts or arrangements with competitors or others that restrict competition, set prices, manipulate offers, divide markets or restrict sales. They must not exchange information on current, recent or future prices with competitors.

### 9.F. Conflitto di interessi

Our Suppliers must have a policy and procedure in place to ensure that employees avoid situations where a conflict of interest occurs. A conflict of interest means any circumstance in which a Supplier's ability to act objectively is compromised. This includes, but is not limited to, personal or family relationships with BRANDANI GIFT GROUP staff. If so, we expect our Suppliers to report to all interested parties in the event that an actual or potential conflict of interest occurs.

## 10. COMPLIANCE WITH GLOBAL TRADE

### 10.A. Importation

Our Suppliers must ensure that their business practices comply with all applicable laws, directives and regulations regarding the import of parts, components, raw materials and technical data.

### 10.B. Export

Our Suppliers must ensure that their business practices comply with all applicable laws, directives and regulations regarding the export of parts, components, raw materials and technical data. Suppliers must provide true and accurate information and obtain export licenses and / or authorizations, if necessary.

### 10.C Transparent ethical policies and supply chains

To ensure the transparency of our supply chains, our Suppliers are invited to map, track and continuously monitor all locations at all levels of their supply chain and, upon request, be able to provide information on transparency in the plants owned and / or subcontracted and other sites involved in the production of our products.

Our Suppliers must exercise due diligence on their sources and supply chains, as may be required by law, and at least, they must demand the same from their next-level suppliers.

Compatibly with the size and nature of their business, our Suppliers must establish management systems to support compliance with laws and regulations, as well as the expectations expressed in this Code.

Our Suppliers are encouraged to implement their written Code of Conduct and to convey their principles to the entity providing them with goods and services.

Our Suppliers must maintain effective programs to encourage their employees to make ethical, responsible and value-based choices in their business practice, in addition to compliance with laws, regulations and contractual requirements.



## ETHICAL HOT LINE OF 'BRANDANI GIFT GROUP'

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In case of doubts regarding the application or an irregularity or violation of this Code, please report it to the BRANDANI company using the Ethical Hot Line: [servizioclienti@brandani.it](mailto:servizioclienti@brandani.it)

All information received will be kept in the strictest confidence and identity protection will be guaranteed.

For information, the Hot Line is managed by the Compliance and Ethics Division of 'BRANDANI GIFT GROUP' company.

## IMPLEMENTATION OF THE SUPPLIER CODE OF CONDUCT

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BRANDANI GIFT GROUP will only have business relationships with Suppliers who comply with all the legal and regulatory requirements applicable in the countries in which they operate and the principles of this Code.

This Code applies to any existing and future contractual and / or commercial relationship between BRANDANI GIFT GROUP and our Suppliers.

All new Suppliers will receive copies of our Code in the initial phase of cooperation, while existing Suppliers will receive updates when they are published. The manager of the BRANDANI company will explain the elements of the Code and our expectations to all Suppliers as part of the supplier relationship management process.

All BRANDANI GIFT GROUP Suppliers, existing or new, must acknowledge and accept, in writing, that they have received, read and understood the BRANDANI GIFT GROUP Code (please refer to the acceptance form below).

BRANDANI GIFT GROUP reserves the right to confirm compliance by the Supplier with the principles set out in this Code of Conduct through on-site or documentary checks. If on-site verifications are required, the Business Partner will receive sufficient notice and the verification will not unnecessarily interrupt its operations. This verification may be carried out by the BRANDANI GIFT GROUP or by authorized independent third parties.

If any of the principles expressed in the Code are not satisfied, the Supplier must promptly take corrective actions and provide adequate evidence of the improvements adopted. The Supplier must develop sustainable management, reporting and tracking systems within its operations to ensure continued compliance.

Compliance with this Code is assessed in the decision to assign the activity, in the approval of the Supplier and in the assessment of the Supplier's performance. We promote an open dialogue with all our Suppliers and work with them to help them meet our requirements.

## 'BRANDANI GIFT GROUP' SUPPLIER CODE OF CONDUCT ACCEPTANCE FORM

By signing below, you, as the authorized representative of the Supplier, acknowledge and accept, on behalf of the Supplier, that you have received, read and understood the BRANDANI GIFT GROUP Supplier Code of Conduct.

It is understood that the Supplier is in line with the BRANDANI GIFT GROUP commitment regarding sustainable business practices and understands what the Supplier's obligations are under the Code.

By signing this Acceptance Form, you also accept, on behalf of the Supplier, that BRANDANI GIFT GROUP reserves the right to confirm that the Supplier complies with the principles set out in this Code of Conduct through on-site or documentary checks. If on-site verifications are required, the Business Partner will receive sufficient notice to carry out the same. This verification may be carried out by the BRANDANI GIFT GROUP or by authorized independent third parties.

Thank you for your cooperation and your contribution to create a positive social and environmental impact.

Thank you for supporting our mission and being part of the future of responsible business.

Supplier's company name:	
Name of the signatory:	
Function of the signatory:	
Main contact/s of the supplier with BRANDANI GIFT GROUP company:	
Place:	
Date:	
Signature:	
Chop of supplier:	