

## CODE OF CONDUCT

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### Premise

BOLTINA Supplier Code of Conduct (“the code”) formalizes the key principles under which BOLTINA suppliers and external partners are required to operate. In selecting suppliers and partners, BOLTINA works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of BOLTINA. The code formalizes BOLTINA’s practices and makes clear that, recognizing differences in suppliers’ cultures, geographical location and legal requirements, whatever the product component or service it is, BOLTINA expects they are produced and/or provided in a manner compatible with the high ethical standards. Suppliers are required to comply with the code and to have, maintain and overview a conduct respectful of professional ethics, human dignity and environmental awareness. The code applies to all suppliers of BOLTINA, including every facility.

BOLTINA encourages suppliers to exceed the requirements of the code and promote best practices in their extended networks. BOLTINA encourages its suppliers to discuss any inconsistency between any code requirement and applicable local law.

### Health and Safety

Health and safety is priority to BOLTINA. Suppliers must provide workers a clean, safe and healthy work environment in compliance with all legally mandated standards for workplace health and safety in the Countries in which they operate. This includes any residential facilities a supplier provides to its workers. Clean, safe and healthy work environment includes personal requirements such as rest spaces, clean toilet facilities and proper lighting, temperature, ventilation conditions. When operating, workers must enjoy proper personal protective equipment, machine guards and protections, as well as fire safety. An healthy environment and absence of chemical toxicity is a basic right of each worker.

### Laws and Regulations

Suppliers must operate in full compliance with all applicable laws and regulations of the Countries in which they operate and in full compliance with the code.

### Wage and Benefits

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required or, in those Countries where such laws do not exist, at least equal to their regular hourly payment rate. Suppliers must provide accident insurance to their workers for work-related accidents and compensation for work-related accidents resulting in permanent disability.

### Hours of Work

Suppliers must ensure that on a regularly scheduled basis, except in extraordinary business circumstances, workers are not required to work more than ... (....) hours a week, including overtime. Except in extraordinary business circumstances, all workers are entitled to at least one day off in every seven-days period.

### Non discrimination

Suppliers must ensure employment – including hiring, payment, benefits, advancement, termination and retirement – is based on ability and not on beliefs or any other personal characteristics such as color, race, caste, religion, age, maturity, nationality, social or ethnic origin, marital status, sexual orientation, gender, gender identity or expression, pregnancy, political affiliation, disability or any other status or characteristic that is not related to the individual’s merit or the inherent requirements of the job.

### Women’s right

BOLTINA celebrates women and protects women’s health. Suppliers will ensure women workers receive equal treatment in all aspects of employment. Pregnancy tests will not be a condition of employment and

pregnancy testing – to the extent provided – will be voluntary and the option of the worker. In addition, workers will not be forced to use contraception.

### **Freedom of Association**

Suppliers must recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association. Suppliers also must respect any legal right of workers to bargain collectively.

### **Environment**

BOLTINA celebrates Mother Earth. Suppliers must comply with all local environmental laws applicable to the workplace, the products produced, and the methods of manufacture. Suppliers must not use materials that are considered harmful to the environment. They should encourage environmental sustainability and the use of ESG processes and materials that are environmentally harmless.

### **Subcontracting**

Suppliers must not use subcontractors to manufacture BOLTINA products or product components without prior written and punctual approval from BOLTINA. Suppliers must ensure that their suppliers, service providers, and extended networks have themselves high ethical standards and business practices respectful of human dignity and environment.

### **Corruption and fraud**

Bribery, extortion and kickbacks are prohibited. Suppliers must comply with all applicable anti-bribery and anticorruption laws. No illegal activities should be tolerated by suppliers, as well as no activities involving black-listed Countries.

### **Child Labour**

Suppliers must comply with local laws regarding the minimum age of employees. The minimum age for workers must be 18 years.

### **Exploitation of labour**

Suppliers must comply with all legal requirements for the work of authorized workers, particularly those pertaining to hours of work, wages, safety, working and safety conditions, and the handling of dangerous materials.

### **Forced Labor**

Suppliers must not use any type of involuntary or forced labour, including indentured, bonded, prison, slave or human trafficked labour.

### **Harassment**

Suppliers must treat all workers with full respect and dignity. No work shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, Suppliers will not use monetary fines as a disciplinary practice.

### **Compliance**

BOLTINA will take affirmative measures, such as announced and unannounced inspections of production facilities, to ensure compliance with this code. Suppliers must grant delegates or representatives from BOLTINA full access to the facilities, documents, worker records and workers for confidential interviews in compliance with local laws. Suppliers are expected to take necessary corrective actions to promptly remedy any identified non-conformity or negligence. BOLTINA reserves the right to terminate anytime its business relationship with any supplier who is unwilling or unable to comply with the code.