

SUSTAINABLE PROCUREMENT POLICY

General Index

1. INTRODUCTION	2
2. OBJECTIVE OF THE SUSTAINABLE PROCUREMENT POLICY.....	2
3. SCOPE OF APPLICATION	2
4. REGULATORY CONTEXT.....	2
5. LABOR, HUMAN RIGHTS, AND SOCIAL PRACTICES	3
6. QUALITY	3
7. HEALTH AND SAFETY AT WORK.....	3
8. ENVIRONMENTAL PROTECTION.....	4
9. USE OF MATERIALS WITH ENVIRONMENTAL AND SOCIAL IMPACT.....	4
10. ETHICS AND CORPORATE INTEGRITY	5
11. INFORMATION SECURITY	6
12. TRAINING and INFORMATION	6
13. VIOLATIONS, MONITORING, AND CORRECTIVE ACTIONS.....	6

INDICE DELLE REVISIONI		PAGINE	DESCRIZIONE	ESEGUITO	APPROVATO
REV. 0	DATA 12.20	Tutte	Creazione	Barbara Bazzurro Davide Sabani	Marco Manzoni
REV.1	DATA 12.23	5-10	Aggiunta rispetto dei salari minimi e orario di lavoro-Evidenziato impegno contro la discriminazione e il lavoro forzato	Barbara Bazzurro	Marco Manzoni

SUSTAINABLE PROCUREMENT POLICY

1. INTRODUCTION

NTS S.p.A. is committed to conducting its commercial activities in full compliance with the values and behaviors outlined in the Ethical Code published in the "About Us" section at www.nts moulding.com.

In line with the aim of enhancing its services comprehensively and professionally, the company intends to increasingly engage in partnerships with suppliers based on trust and respect, striving for sustainable and ethically coherent achievement of shared objectives.

To achieve this, NTS S.p.A. (hereinafter referred to as "NTS") has defined, over recent years, a structured process for managing its suppliers, requiring them to:

- Adhere to regulatory requirements, laws, and prevailing standards, ensuring respect for human rights.
- Safeguard the health and safety of their employees and the community in relation to their activities.
- Adopt responsible policies for environmental protection.
- Meet Quality requirements and respond promptly and flexibly to diverse needs.
- Promote innovation and research for improved technical solutions.
- Protect the security and integrity of data and information exchanged in every use and storage.
- Ensure the competitiveness required by our reference market through a LifeCycle Cost (LCC) approach.

This Policy signifies NTS's commitment to the described objectives and will be regularly updated to ensure relevance, compliance, and alignment with the initiative.

2. OBJECTIVE OF THE SUSTAINABLE PROCUREMENT POLICY

This Sustainable Procurement Policy (hereinafter referred to as "Policy") aims to promote sustainable and responsible procurement practices throughout NTS's supply chain. In this regard, NTS also requires its suppliers to recognize and adopt these practices, ensuring compliance throughout the entire supply chain, including sub-suppliers.

The following code of conduct aims to convey the values that NTS pursues to its suppliers, with the belief that these suppliers apply the listed principles not only within their own production environment but also throughout their respective procurement chains.

Respecting and endorsing this Policy is a necessary condition for establishing and maintaining a commercial relationship with NTS. Any violation of this Policy grants NTS the right to terminate the commercial relationship.

3. SCOPE OF APPLICATION

This Policy applies to all suppliers of NTS.

4. REGULATORY CONTEXT

This Policy is based on the principles outlined in the Universal Declaration of Human Rights of the United Nations, the Tripartite Declaration of Principles concerning Multinational Enterprises, the ILO Social Policy, the OECD Guidelines for Multinational Enterprises, and refers to the internationally recognized principles of ISO 20400 Standard.

SUSTAINABLE PROCUREMENT POLICY

Suppliers are required to comply with the laws and standards applicable in the countries where they operate. In the event that local regulations are less stringent than the principles outlined in this Policy, suppliers commit to adopting, within a reasonable, shared, and documented timeframe, the necessary measures to align with the principles and behaviors defined in this Policy as detailed below.

5. LABOR, HUMAN RIGHTS, AND SOCIAL PRACTICES

In accordance with international standards and with the aim of preventing NTS from indirectly causing human rights violations, all suppliers are required to adhere to the following principles:

- Minimum wages, working hours, freedom of association, and collective bargaining: Suppliers must commit to complying with all existing regulations protecting minimum wages and working hours.
- Suppliers must ensure full compliance with all collective labor agreements, ensuring that their workers receive fair and dignified wages.
- Suppliers commit to ensuring freedom of association for their employees as stipulated by the Constitution.
- Child labor and/or forced labor: All partners must absolutely avoid any form of child labor and/or forced labor.
- Suppliers must commit to ensuring compliance with international standards in force. Additionally, NTS does not accept any form of coercion of workers by suppliers, whether economic, psychological, or physical.
- Discrimination and harassment: NTS suppliers must refrain from any form of harassment and/or discrimination based on religion, gender, politics, ethnicity, or culture. Behaviors that may offend and humiliate workers are not tolerated by NTS.
- NTS also promotes wage equality policies, inclusion, and equal treatment between male and female workers, encouraging its suppliers to do the same.
- Selection, recruitment, and personnel management: NTS suppliers commit to respecting the principles of equality and equal opportunities in the selection and recruitment of personnel, rejecting any form of favoritism.

6. QUALITY

NTS promotes continuous improvement in the performance of its suppliers and their involvement in product innovation processes, emphasizing a strategic partnership approach. In order to ensure the utmost safety and quality of its products, NTS commits to involving suppliers from the early stages of project development, adopting a preventive and proactive approach to anticipate and resolve any identified issues.

To uphold its Quality Policy, NTS requires suppliers to have a certified Quality Management System.

NTS aims for all suppliers of direct materials, services, and/or products related to the product to be equipped with at least ISO 9001 international certification, obtained from accredited certification bodies.

NTS manages all direct material suppliers in compliance with the requirements outlined in these standards.

7. HEALTH AND SAFETY AT WORK

NTS suppliers must consistently strive to ensure a well-maintained and risk-aware work environment. Every health and safety risk must be promptly assessed and mitigated. This commitment should be demonstrated

SUSTAINABLE PROCUREMENT POLICY

through the establishment of General Health and Safety Work Behavior Standards. In particular, the supplier must provide all legally required Personal Protective Equipment (PPE) to its workers and commit to training them on workplace safety issues.

8. ENVIRONMENTAL PROTECTION

NTS guarantees compliance with all current environmental standards and expects the same behavior from its suppliers.

- Norms, laws, and general behaviors: The conduct of every supplier must align with ISO 14001 and aim for certification by a third-party entity.
- Additionally, the supplier must commit to efficiently using purchased raw materials, ensuring increasingly conscious use of potentially polluting resources.
- Efficiency and waste reduction must be guided by goals for reducing both economic and environmental waste.
- Greenhouse gas emissions reduction: The NTS supplier commits to reducing its atmospheric greenhouse gas emissions through eco-friendly corporate policies. NTS encourages the use of renewable energy resources according to the goals of the EU's "Fit for 55" plan by 2030.
- Conscious waste management: NTS promotes circular economy paradigms and expects its suppliers to do the same. Conscious waste management is crucial for the company's future development.
- Conscious use of water and energy resources: The supplier must ensure environmentally respectful energy and water consumption. NTS expects the supplier to apply every possible form of saving and reduction in water and energy resources.
- Chemical substance management: The NTS supplier commits to safely managing chemical substances that may pollute the environment and pose risks to workers. The supplier also expressly requires compliance with all regulations prohibiting the use or transformation of chemicals banned by the laws of each destination country. The supplier commits to recording and reporting to competent authorities the quantities of chemical emissions specified by the laws of each country and region.
- Packaging: NTS promotes sustainable packaging use and expects this behavior to be followed by its suppliers. Adherence to current regulations such as 129/97/CE (packaging environmental labeling) must be the foundation of the supply relationship with NTS.

9. USE OF MATERIALS WITH ENVIRONMENTAL AND SOCIAL IMPACT

NTS commits to sourcing raw materials and components from suppliers and business partners capable of demonstrating respect for human rights throughout their supply chain activities. Therefore, NTS requires its suppliers to declare the presence and origin of materials such as:

- Conflict Minerals: 3TG, namely Gold, Tantalum, Tin, and Tungsten, and their derivatives such as coltan, cassiterite, and wolframite.
- Cobalt and Mica.

To fulfill this requirement, suppliers must conduct a thorough investigation into their supply chain in accordance with the guidelines of the OECD (www.oecd.org), specifying the requests in terms of due diligence on the subject and in line with relevant regulations.

SUSTAINABLE PROCUREMENT POLICY

NTS mandates that the supplier be aware of the provisions of the REACH Regulation, fulfill its obligations under the Regulation, and ensure that its suppliers operate in accordance with the REACH Regulation. The supplier declares that its products do not contain any substances listed in the Candidate List according to the latest update issued by ECHA.

The supplier commits to updating this declaration whenever a new update of the Candidate List is released by ECHA. It also confirms its intention to pre-register and/or register or have pre-registration and/or registration carried out by a preceding actor in the supply chain, for all substances contained in the supplied product requiring such actions.

The supplier also declares that the appropriate conformity assessment procedure has been applied to Directive EU 2002/95/EC in its new version 2011/65/EU and to Directive 2000/53/EC (end-of-life vehicles) for all components and/or materials supplied.

It is the responsibility of the supplier to promptly update and send the declaration whenever the regulation is modified. NTS reserves the right to request its suppliers to remove from their supply chain any foundries/refineries considered non-compliant with the Responsible Minerals Assurance Process (RMAP) Protocol.

NTS also reserves the right to request from suppliers the presence and origin of other materials critical for environmental and social impact, in accordance with evolving regulatory standards and in fulfillment of customer requests.

10. ETHICS AND CORPORATE INTEGRITY

Through this document, NTS aims to ensure that ethics and corporate integrity form the foundation of the supplier relationship.

- **Compliance with Laws:** NTS expects every supplier to adhere to all rules and regulations pertaining to the conducted work and commercial activities.
- **Anti-corruption and Anti-money laundering:** NTS suppliers are required to ensure maximum transparency, fairness, and good faith in commercial transactions with all parties, employing suitable measures to counter offenses outlined in Articles 648 (receiving stolen goods), 648 bis (money laundering), 648 ter (use of money, goods, or benefits of illicit origin), and 648 ter 1 (self-money laundering) of the Italian Penal Code. Suppliers are committed to complying with anti-money laundering regulations.
- **Financial Responsibility:** NTS suppliers are responsible for verifying the correctness of assignments to third parties, the regularity of payments and financial flows, as well as tax compliance. This includes the selection of suppliers for goods and services, the establishment of criteria for evaluating offers, and the verification of information regarding the commercial/professional reliability of suppliers and partners.
- **Fair Competition:** Suppliers must conduct their activities in accordance with all current laws regarding fair competition. Practices aimed at manipulating the market are not permissible and do not align with the ethical code promoted by NTS.
- **Fraud and Conflicts of Interest:** Suppliers commit to avoiding any form of conflict of interest. Any potential conflict of interest must be promptly communicated to NTS. Conversely, every party

SUSTAINABLE PROCUREMENT POLICY

involved in a contractual relationship with NTS must ensure complete fraud prevention by conducting activities honestly and reliably.

11. INFORMATION SECURITY

Through this document, NTS aims to ensure the respect for the confidentiality of sensitive and non-disclosable information as the foundation of the supplier relationship. Particular attention is given to:

Protection of Intellectual Property: NTS suppliers condemn any possible disturbance to the freedom of industry or trade, as well as any form of unfair competition, fraud, counterfeiting, or misappropriation of industrial property titles. Suppliers safeguard their intellectual property rights, including copyrights, patents, trademarks, and distinctive signs, adhering to the policies and procedures provided for their protection. At the same time, suppliers orient their actions in respect of the intellectual property of others.

Privacy and Confidentiality: Suppliers must ensure compliance with regulations regarding the confidentiality of information and data protection. Any information and/or personal data exchanged during the contractual relationship must be considered confidential and treated as such.

12. TRAINING and INFORMATION

NTS is committed to adequately training its employees regarding the principles outlined in this document and encourages all suppliers to disseminate these principles through appropriate training activities for their employees and suppliers.

13. VIOLATIONS, MONITORING, AND CORRECTIVE ACTIONS

Suppliers are directly responsible for any violation of this code. Any non-compliance must be promptly communicated to NTS. NTS may request information from its suppliers regarding the aforementioned issues through specific questionnaires/surveys and reserves the right to conduct audits through NTS personnel and/or third parties, with appropriate prior communication, on the matters covered by this Policy.

In the event of non-compliance, NTS will:

- Request suppliers to prepare and subsequently implement a plan to rectify the non-conformities.
- Conduct document checks and/or further audits to verify the actual implementation of the recovery plans mentioned above, with appropriate prior communication.

Any violation of this code will be subject to internal assessment and may lead to temporary or permanent termination of the supply contract. NTS is committed to reviewing this document, keeping it up-to-date, and ensuring that every supplier has the opportunity to promptly review it.

Lallio, 22/12/2023

Marco Manzoni
CEO

Per Accettazione:

Firma Fornitore

Funzione

Data e Luogo
