

SUSTAINABLE PURCHASING CODE OF CONDUCT

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SUSTAINABLE PURCHASING CODE OF CONDUCT

1. INTRODUCTION

NTS S.p.A. is committed to conducting its business activities in full compliance with the values and principles set out in its Code of Conduct, published in the “Who We are” section of the company website at www.nts moulding.com.

Consistent with its commitment to continuously improving its services in a comprehensive and professional manner, the Company seeks to strengthen partnerships with suppliers based on mutual trust and respect, pursuing shared objectives in a sustainable and ethically responsible way.

NTS S.p.A. firmly believes in the importance of establishing partnerships with suppliers that are actively committed to mitigating any negative environmental and social impacts arising from their operations.

To this end, NTS S.p.A. (hereinafter also referred to as “NTS”) has established, over the years, a structured supplier management process and requires its suppliers to:

- Comply with all applicable legal requirements, regulations, and standards, while ensuring respect for human rights.
- Protect the health and safety of their employees and the communities affected by their activities.
- Implement responsible environmental protection policies and practices.
- Meet quality requirements and respond to business needs in a timely and flexible manner.
- Promote innovation and the development of improved technical solutions.
- Protect the security and integrity of data and information exchanged, used, and stored.
- Ensure the level of competitiveness required by our target market through a Life Cycle Cost (LCC) approach.

This Policy formalizes NTS's commitment to the objectives described above and will be reviewed and updated regularly to ensure its continued relevance, compliance, and alignment with the initiative.

2. PURPOSE OF THE SUSTAINABLE PROCUREMENT POLICY

This Sustainable Procurement Policy (hereinafter also referred to as the “Policy”) aims to promote sustainable and responsible sourcing practices throughout NTS's entire supply chain.

In this regard, NTS also requires its Suppliers to acknowledge and adopt the same principles and to ensure their compliance throughout their own supply chains, including, for example, their Sub-suppliers.

The purpose of this Code of Conduct is to communicate the values pursued by NTS to its suppliers, with the expectation that they will apply the principles set out below not only within their own operations, but also throughout their respective procurement and supply chains.

Compliance with and acceptance of this Policy is a prerequisite for establishing and maintaining a business relationship with NTS.

Any violation of this Policy will be reviewed by NTS, which reserves the right to take appropriate corrective actions, up to and including the termination of the business relationship.

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3. SCOPE

This Policy applies to all suppliers of NTS.

4. REGULATORY FRAMEWORK

This Policy is based on internationally recognized principles concerning human rights, decent work, and corporate social responsibility. In particular, it is inspired by and aligned with the following international standards and guidelines:

- **The Universal Declaration of Human Rights (United Nations, 1948)**, which establishes the fundamental rights and freedoms inherent to every individual.
- **The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy**, which promotes fair working conditions, social dialogue, and respect for workers' rights throughout global value chains.
- **The OECD Guidelines for Multinational Enterprises**, which include recommendations on due diligence, human rights, environmental protection, emerging technologies, and anti-corruption measures, with particular emphasis on sustainability and the protection of vulnerable groups.
- **The United Nations Guiding Principles on Business and Human Rights (UNGPs)**, which establish the “Protect, Respect and Remedy” framework for corporate responsibility with regard to human rights.
- **ISO 20400:2017 – Sustainable Procurement**, which provides guidance on integrating sustainability into procurement processes and promoting responsible practices throughout the supply chain.

This Policy reflects the Organization's commitment to conducting its activities with full respect for human rights, while promoting transparency, inclusion, equal treatment, and environmental and social sustainability, in line with the **United Nations 2030 Agenda Sustainable Development Goals (SDGs)**.

Suppliers are required to comply with all applicable laws, regulations, and standards in the countries in which they operate. Where local laws or regulations are less stringent than the principles set out in this Policy, Suppliers shall undertake to adopt, within a reasonable, mutually agreed and documented timeframe, the necessary measures to align with the principles and requirements defined in this Policy and detailed below.

5. LABOUR, HUMAN RIGHTS AND SOCIAL PRACTICES

In line with international standards and with the aim of preventing NTS from being indirectly involved in human rights violations, all Suppliers are required to comply with the following principles:

The Supplier shall ensure full compliance with all applicable collective labour agreements, guaranteeing that its employees receive fair and decent wages that meet or exceed the minimum standards established by applicable laws and regulations.

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The Supplier shall comply with all applicable requirements relating to minimum wage, working hours, weekly rest periods, paid leave, freedom of association, and the right to collective bargaining, in accordance with national legislation and the principles of the International Labour Organization (ILO).

The use of child labour and/or forced labour is strictly prohibited. The Supplier shall implement effective measures to prevent any form of exploitation, economic, psychological, or physical coercion, in accordance with international conventions on human rights and decent work.

The Supplier shall refrain from any form of discrimination or harassment, whether direct or indirect, based on gender, sexual orientation, religion, ethnicity, political opinion, disability, or any other personal or social characteristic. Any conduct that may undermine the dignity, integrity, or well-being of workers will not be tolerated.

NTS actively promotes equal pay, inclusion, and equal treatment policies for all employees and expects its Suppliers to adopt similar measures, fostering fair, respectful, and inclusive working environments.

In all recruitment, selection, and personnel management activities, the Supplier shall operate in accordance with the principles of non-discrimination, equal opportunity, and merit-based decision-making, avoiding any form of favoritism or unethical practice.

6. QUALITY

NTS promotes the continuous improvement of Supplier performance through active involvement in product innovation and technological development within a strategic and sustainable partnership framework.

To ensure the highest standards of safety, quality, and reliability, NTS adopts a preventive and proactive approach, involving Suppliers right from the early stages of project development. This allows for the timely identification of any critical issues and the implementation of shared solutions, reducing risks and improving process effectiveness.

In support of its Quality Policy, NTS requires Suppliers to maintain a Quality Management System certified at least to **ISO 9001:2015**.

NTS manages all direct Suppliers in compliance with the requirements contained in these Standards.

7. OCCUPATIONAL HEALTH AND SAFETY

The Supplier is required to guarantee safe working environments that comply with current legislation, in particular with Italian Legislative Decree no. 81/2008 and its subsequent amendments (or the corresponding national regulatory framework in the case of a foreign supplier), and with current regulations on Personal Protective Equipment (DPI for Italian regulation).

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Risk assessment in accordance with Legislative Decree no. 81/2008, the drafting of the Risk Assessment Document (DVR), and the adoption of preventive and protective measures are mandatory.

The Supplier must provide workers with the Personal Protective Equipment required by law, which must comply with European harmonized standards, and ensure adequate and documented health and safety training.

8. ENVIRONMENTAL PROTECTION

NTS complies with applicable environmental regulations and expects the same commitment from its Suppliers.

Suppliers are expected to operate in accordance with ISO 14001:2015 and to address emerging requirements related to climate change, product life cycle, circular economy, and stakeholder transparency.

NTS requires Suppliers to:

- Optimize resource use and reduce environmental impact, in line with the objectives of the European "Fit for 55" package to reduce greenhouse gas emissions by 55% by 2030.
- Adopt efficient waste management practices, promoting reuse, recycling, and recovery according to circular economy principles.
- Reduce water and energy consumption, favoring the use of renewable sources and low-environmental-impact technologies.
- Adopt sustainable packaging management, with mandatory environmental labeling for all packaging intended for the final consumer.

NTS actively promotes the adoption of circular economy models, waste reduction, and environmental transparency throughout the entire supply chain.

9. USE OF MATERIALS WITH ENVIRONMENTAL OR SOCIAL IMPACT

NTS purchases raw materials and components only from suppliers capable of demonstrating compliance with human rights and environmental requirements throughout their supply chains.

To this end, NTS requires its Suppliers to declare the presence and origin of the following materials:

Conflict Minerals: 3TG (Gold, Tantalum, Tin, and Tungsten), including derivatives such as coltan, cassiterite, and wolframite.

Cobalt and Mica, which are subject to increasing regulatory scrutiny due to their environmental and social impacts.

Suppliers must conduct thorough due diligence on their supply chain in compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, following the 5-step framework and utilizing tools such as the CMRT (Conflict Minerals Reporting Template) and EMRT (Extended Minerals Reporting Template).

In compliance with the REACH and CLP directives, the Supplier must:

- Be aware of and compliant with the REACH Regulation (EC No. 1907/2006) and the CLP Regulation (EC No. 1272/2008), including the latest updates regarding Category 1B CMR substances, PFAS, and microplastics.

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- Declare the absence in their products of any substances included in the Candidate List updated by [ECHA](#).
- Promptly update this declaration with each new publication of the Candidate List.
- Pre-register and/or register all substances subject to registration requirements, either directly or through upstream actors in the production chain.

In compliance with the RoHS and End-of-Life Vehicles (ELV) directives, the Supplier declares to have applied conformity assessment procedures:

- To Directive 2011/65/EU (RoHS II) and its 2024–2025 updates, including the latest amendments regarding exemptions for cadmium and lead.

10. BUSINESS ETHICS AND INTEGRITY

Through this document, **NTS** aims to ensure that ethics and business integrity form the foundation of its supplier relationships.

- **Compliance with Laws:** NTS expects each supplier to comply with all applicable laws, regulations, and requirements related to its business and commercial activities.
- **Anti-Corruption and Anti-Money Laundering:** NTS suppliers shall ensure the highest standards of transparency, fairness, and good faith in all business transactions with counterparties. Suppliers shall implement appropriate measures to prevent offenses related to receiving stolen goods, money laundering, the use of money, assets, or benefits derived from unlawful activities, and self-laundering, and shall comply with all applicable anti-money laundering regulations.
- **Financial Responsibility:** NTS suppliers shall verify the appropriateness of assignments entrusted to third parties, the regularity of payments and financial transactions, compliance with tax obligations, the selection process for suppliers of goods and services, and the criteria used to evaluate offers. Suppliers shall also verify all relevant information concerning the commercial and professional reliability of their suppliers and business partners.
- **Fair Competition:** Suppliers shall conduct their business in compliance with all applicable competition and antitrust laws. Practices aimed at manipulating, restricting, or distorting market competition are not acceptable and are not consistent with the ethical principles promoted by NTS.
- **Fraud and Conflicts of Interest:** Suppliers shall avoid any actual or potential conflict of interest. Any situation that could give rise to a conflict of interest shall be promptly disclosed to NTS. Furthermore, all parties involved in a contractual relationship with NTS shall actively prevent fraud by conducting their activities with honesty, transparency, and integrity.

11. INFORMATION SECURITY

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In accordance with this Sustainable Procurement Code of Conduct, suppliers are required to ensure the responsible and secure management of information, particularly information shared during commercial and manufacturing activities. The protection of company data, projects, and personal information shall be ensured through appropriate cybersecurity measures, in compliance with applicable regulations and international standards.

Suppliers shall adopt transparent practices, prevent any unauthorized disclosure of information, and actively cooperate with the Company in mitigating cybersecurity risks, thereby contributing to a sustainable, ethical, and resilient supply chain.

- **Intellectual Property Protection:** NTS suppliers condemn any form of infringement of the freedom of industry or trade, as well as any form of unfair competition, fraud, counterfeiting, or misappropriation of intellectual and industrial property rights. Suppliers shall safeguard their own intellectual property rights, including copyrights, patents, trademarks, and distinctive signs, in accordance with the policies and procedures established for their protection. At the same time, suppliers shall conduct their activities with full respect for the intellectual property rights of third parties.
- **Privacy and Confidentiality:** Suppliers shall ensure compliance with all applicable laws and regulations concerning confidentiality and data protection. Any information and/or personal data exchanged during the contractual relationship shall be considered confidential and treated accordingly. Suppliers shall implement appropriate measures to protect such information from unauthorized access, use, disclosure, alteration, or destruction.

12. TRAINING AND AWARENESS

NTS commits to providing appropriate training to its employees on the principles contained in this Policy and encourages Suppliers to promote the same principles throughout their organizations and supply chains through adequate training and awareness activities.

13. NON-COMPLIANCE, MONITORING AND CORRECTIVE ACTIONS

Suppliers are directly responsible for complying with the provisions of this Code. Any violation or non-compliance shall be promptly reported to **NTS**.

NTS may request information from its Suppliers regarding the topics covered by this Code through specific questionnaires and surveys. Furthermore, NTS reserves the right to carry out assessments and audits, either through its own personnel and/or qualified third parties, subject to prior notification, to verify compliance with the requirements set forth in this Policy.

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In the event of non-compliance, NTS shall:

- Require Suppliers to develop and subsequently implement a corrective action plan to address the identified non-conformities;
- Conduct document reviews and/or follow-up audits, subject to prior notification, to verify the effective implementation and effectiveness of the aforementioned corrective action plans.

Any violation of this Code will be subject to internal evaluation and, depending on its severity and potential impact, may result in the suspension or termination of the supply agreement.

NTS is committed to periodically reviewing and updating this document and to ensuring that all Suppliers are given timely access to its latest version.

Lallio, 16 October 2025

Marco Manzoni
(CEO)

Acknowledged and Accepted:

Supplier Signature

Title / Role

Date and Place

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