



I N S A F E H A N D S

SUPPLIER CODE OF CONDUCT REFLEXX S.p.A.

Edition 01
Revision 00

Approval date by CEO Reflexx S.p.A.: October 31st 2025

1. Introduction

REFLEXX S.p.A., in line with its Code of Ethics and Sustainability Policy, promotes a responsible supply chain based on integrity, transparency, respect for human rights and environmental protection.

All suppliers are required to adopt ethical and sustainable behaviours, in line with the ten principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

This Code defines the minimum standards that REFLEXX expects from each supplier and its subcontractors. Adherence to the Code is a condition for initiating and continuing the business relationship.

2. General Principles of Conduct

Suppliers must:

- Comply with all applicable laws and regulations applicable in the countries where they operates and related to labor, environment, safety, competition, and data protection.
- Act with honesty, fairness, transparency, and integrity.
- Keep accurate and verifiable records.
- Avoid conflicts of interest and any form of favoritism or corruption.
- Collaborate actively with REFLEXX in ESG monitoring and continuous improvement initiatives.
- Commit to communicating and reporting ESG performances publicly with transparency.

3. Human Rights, Labor and Welfare

Suppliers must:

- Ensure fair, safe, and decent working conditions, in compliance with national laws and ILO standards.
- Prohibit forced labor, modern slavery, and human trafficking.
- Exclude child labor (no worker under 15 or below the local legal minimum age).
- Respect freedom of association and collective bargaining rights.
- Promote equality, diversity, and non-discrimination.
- Guarantee fair wages and lawful working hours.
- Protect workers' health and safety through adequate management systems (e.g. ISO 45001 or equivalent). Achieve zero incidents and maintain the highest health and safety standards.

4. Business Integrity and Anti-Corruption

REFLEXX applies a zero-tolerance policy toward corruption.

Suppliers must:

- Not offer, promise or accept money, gifts or benefits that may influence business decisions.
- Report potential conflicts of interest.
- Comply with competition and trade sanction laws.
- Ensure personal data protection according to GDPR and local laws.

5. Environment and Resource Management

In line with REFLEXX's Sustainability Policy, suppliers must:

- Comply with all environmental laws and obtain required permits.
- Adopt a precautionary approach to environmental risks.
- Implement environmental management systems (ISO 14001 or equivalent).
- Progressively reduce the environmental impact of their activities, committing to measure their carbon footprint at least for Scope 1 and 2.
- Cooperate with REFLEXX on sustainable innovation and eco-design projects for products and packaging (align with Reflexx's guidelines on sustainable packaging by optimizing and minimizing the environmental impact of packaging: paper or plastic, ink, varnish,...)..

6. Quality, Innovation and Safety of Product and Packaging

Suppliers must:

- Guarantee safe, compliant products meeting REFLEXX and regulatory standards.
- Maintain certified quality systems (e.g. ISO 9001).
- Promote sustainability-driven innovation and responsible materials.

7. Relationships and Communication

REFLEXX expects relationships based on trust, transparency, and cooperation.

Suppliers must:

- Keep all shared information confidential.
- Report incidents or non-compliance.
- Participate in quality and esg surveys, assessment, audits when required, while ensuring the traceability of their supply chain.

REFLEXX may suspend or terminate relationships for zero-tolerance breaches (corruption, human rights, child labor, severe pollution).

8. Acceptance and Commitment

By signing this document, the Supplier declares to:

- Have read, understood and accepted the REFLEXX Supplier Code of Conduct.
- Commit to comply with its principles and extend them through its supply chain.

Place and Date: _____

Supplier Company: _____

Name and Title of the Responsible Manager: _____

Signature: _____