

# CODE OF CONDUCT FOR SUPPLIERS



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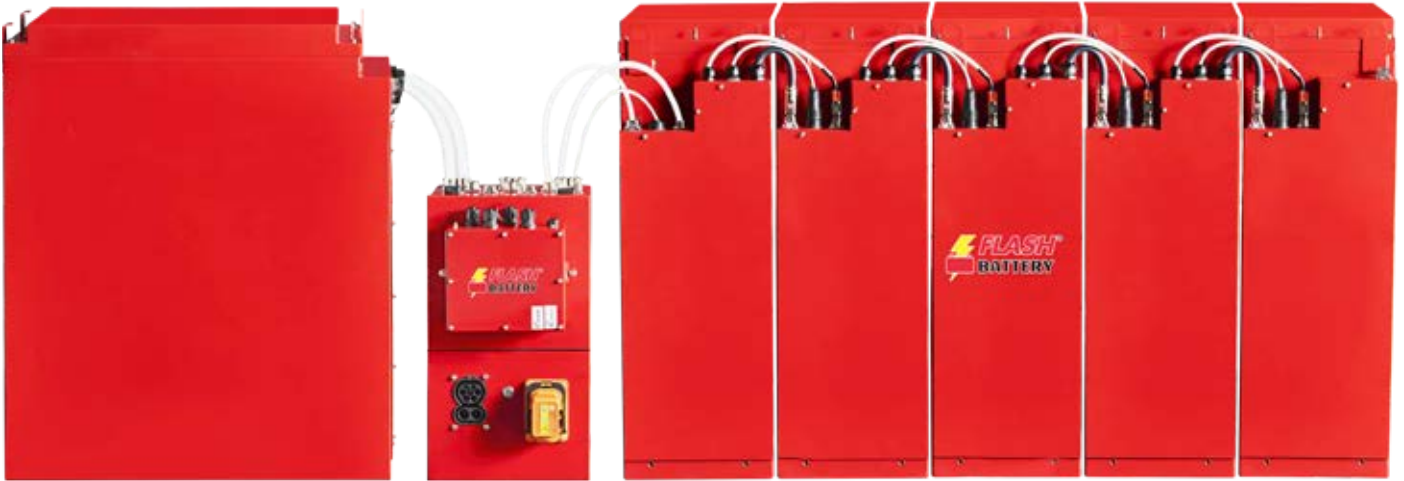
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## 1. Foreword



Flash Battery Srl (hereinafter Flash Battery) takes the greatest care in ensuring compliance and respect for its values; the main values adopted by the company can be found in the Code of Ethics and in this Code of Conduct for its Suppliers.

The Code of Ethics focuses on behaving in an honest, reliable and ethical manner and on each individual's responsibility in this respect. It contains all the principles and values which Flash Battery is inspired by and demonstrates the company's desire to operate with the utmost respect for the principles of lawfulness and fairness. The Code of Ethics lays down the rules of conduct to be followed when working for the company in order to ensure the smooth running, reliability and good reputation of Flash Battery.

While this Supplier Code of Conduct contains Flash Battery's expectations for how Suppliers should behave when carrying out their company work. Generally speaking,

Flash Battery promotes management inspired by respect for existing laws and the values of integrity and trust, while supporting and encouraging sustainable operating practices.

Suppliers are required to comply with the provisions in this Code of Conduct and adapt their behaviour and actions to the principles contained herein, so much so that respect for the principles of this Code is part of their contractual obligations.

Consequently, any breach of the provisions contained herein may constitute a failure to fulfil the contractual obligations undertaken, with all legal consequences regarding termination of contract, or of the assigned task, as well as compensation for any subsequent damage.

The following principles and requirements therefore form the basis for business relationships between Flash Battery and its Suppliers.

## 2. Flash Battery's values



### 2.1. Integrity, transparency and lawfulness

Flash Battery promotes and respects the principles of lawfulness, loyalty and fairness, and requires that its Suppliers operate with full respect for the law with transparency, integrity and fairness.

Flash Battery considers compliance with this condition a binding and essential part of continuing a business relationship. In particular, Flash Battery's Suppliers must act according to existing legislation and regulations (both national and international) that apply to their working environment, as well as in accordance with their contractually agreed commitments and the principles in this Code of Conduct. Suppliers are also required to comply with all applicable national and international accounting, taxation and transparency laws and refrain from any form of fraud, extortion, tax evasion, avoidance, money laundering or any other similar illegal conduct.

### 2.2. Anticorruption

Flash Battery is committed to combating active and passive corruption, both in the public and private sectors.

Flash Battery therefore supports national and international efforts not to influence or distort competition through corruption.

Flash Battery requires that its Suppliers reject and prevent any form of corruption, including facilitation or grease payments (which are paid to speed up the performance of routine tasks by officials). When conducting their business relationships, Suppliers are also prohibited from offering, promising, paying, requesting, receiving or accepting, either directly or indirectly, money or any other form of utility for themselves or others, including gifts or benefits that exceed common courtesy and could be seen as aiming to exercise undue influence or obtaining improper favourable or beneficial treatment.

### 2.3. Conflict of interest

Flash Battery works to prevent encountering situations involving a conflict of interest, while following rules of fairness and impartiality. Suppliers must strive to avoid any situation that could lead to an actual or potential conflict of interest, and must inform Flash Battery of any circumstances that create, or seem to create, unlawful favouritism, collusive practices or choices that could result in unlawful advantages.

### 2.4. Unfair competition

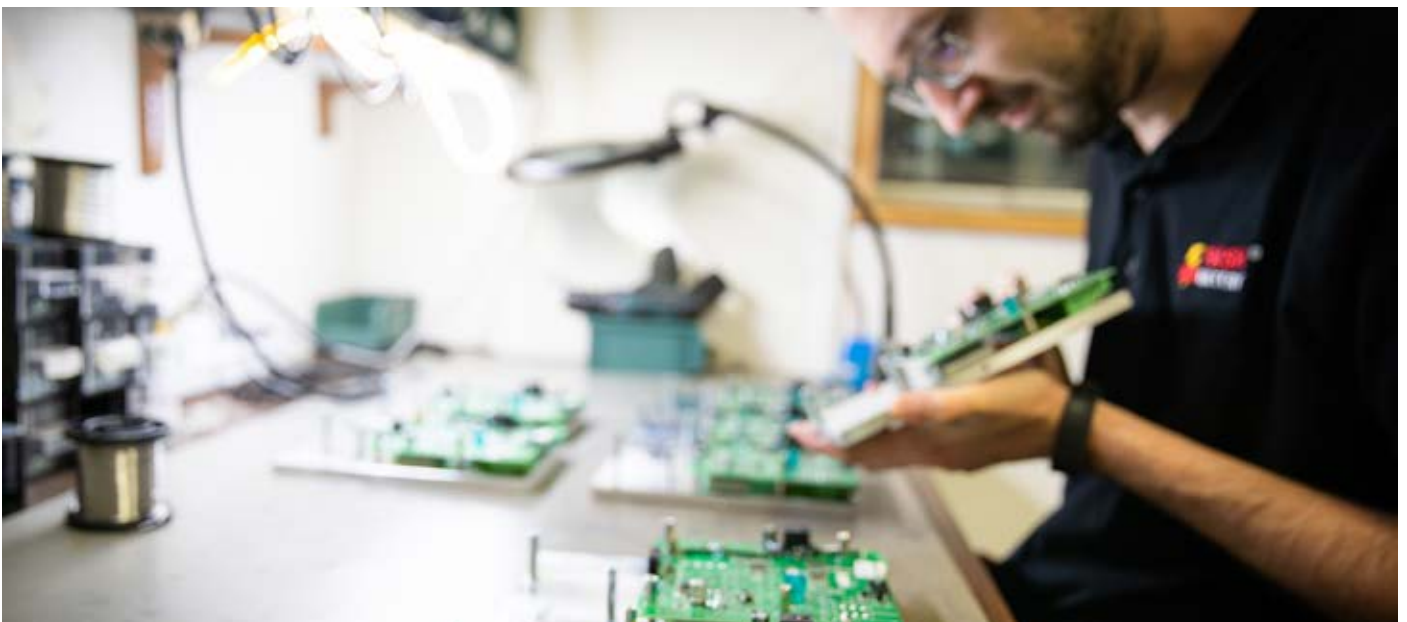
Flash Battery promotes the principles of free and fair competition and proper conduct in business. Consequently, Flash Battery requires that its Suppliers respect any existing antitrust and competition legislation.

In particular, they must not enter into anti-competitive arrangements or agreements with competitors, suppliers, customers or other third parties and they must not abuse any possible dominant position on the market. Suppliers must guarantee that no sensitive

information is exchanged regarding competition, and that there is no other conduct that restricts, or could potentially restrict, competition in an improper way.

### 2.5. Protection of industrial and intellectual property

Flash Battery promotes the protection of industrial and intellectual property at all levels of the value chain. Suppliers are required to act with full respect for the industrial and intellectual property rights of Flash Battery and/or third parties, as well as in accordance with any provisions contained in laws, regulations and agreements aimed at protecting these rights, while also identifying and reporting any breaches, including potential breaches, of the rights in question. Suppliers are required to respect and value the intellectual property of Flash Battery and third parties. Suppliers are responsible for the safekeeping, preservation and appropriate, proper use of any company property and resources provided by Flash Battery to carry out their work and they shall not use



them for any purposes contrary to the law or regulations, while protecting them from theft, abuse, sabotage, loss or damage.

## **2.6. Data protection and confidentiality**

Suppliers are required to use and protect all information appropriately, and shall process personal data and confidential information in accordance with legislation on data protection and confidentiality of information.

In particular, Suppliers must guarantee the right to protection of any personal data processed, whether theirs or third parties' data, while only using the personal data collected for established legitimate purposes appropriate for carrying out their work. They must also guarantee that they have taken adequate technical and organisational security measures, have provided suitable training for people authorised to process data and have properly identified the privacy roles for carrying out their work.

Suppliers are also required to safeguard and appropriately and legitimately use the documentation and information acquired, in any form, due to their relationship with Flash Battery and shall not use this information and documents outside of this relationship. Suppliers shall also ensure that their employees keep company secrets confidential. Any confidential information acquired during this relationship may not be published, shared, forwarded to third parties or made available in any other form without the necessary authorisation. Lastly, Suppliers must guarantee that information is secure according to its importance, identifying and notifying Flash Battery of any security breaches, including potential breaches.



## 2.7. Service and product conformity and sustainable development

Flash Battery promotes the responsible development of its products, paying the utmost attention to the safety and traceability of the materials, components and products used all along the value chain.

The quality and safety of the products and services offered by Suppliers must comply with any applicable national and international laws and regulations, while meeting - or exceeding - industrial quality and safety standards, as well as any technical requirements and standards that might be required by Flash Battery.

Suppliers are also required to comply with applicable regulations on raw material procurement, production, processing, marketing and distribution processes, taking into account their environmental and social impacts. This includes taking measures aimed at identifying risks - for example in relation to the direct or indirect financing of armed conflicts and serious human rights violations, such as child labour, forced labour and slavery - and at adopting appropriate measures to minimise these risks.

Suppliers must provide clear and precise information on the methods and resources they use, on the production sites and the characteristics of the products or services provided, refraining from making any misleading statements and improving the transparency and traceability of the supply chain.



## 3. Employee labour law rights and human rights



### 3.1. Human rights

For Flash Battery, all business relationships must be based on respect for internationally recognised human rights. Flash Battery adheres to the values expressed in the United Nations' Universal Declaration of Human Rights and in the main Conventions of the International Labour Organization (ILO).

Flash Battery's Suppliers must act with full respect for human rights, including workers' rights, in their work and operations, recognising without any distinction the freedom and equality in dignity and rights of human beings, as enshrined by the aforementioned international documents. In particular, Suppliers must treat workers with dignity and respect, without subjecting them to degrading working conditions, and they must promote a work place and culture where harassment is not tolerated, including sexual harassment, threats of harassment or retaliation for reporting harassment.

### 3.2. Child labour

Child labour is prohibited. The minimum working age must be respected according to national laws. If no such laws exist, Convention C138 of the International Labour Organization (ILO) shall apply. Pursuant to the aforementioned Convention, no child under the age of 15 may be hired to work either directly or indirectly, except in the cases provided for by Articles 6 and 7 of the Convention.

Suppliers must guarantee that young employees under the age of 18 do not work overtime or night shifts and are protected from working conditions that could harm their health, safety, morality or development. In particular, Suppliers must not directly or indirectly employ minors who have not finished their compulsory education and have not reached the minimum working age as established by applicable law, and they must combat the use of child labour in any form.



### **3.3. Forced labour**

Flash Battery promotes the right to work and the principle of freedom to choose an occupation, which must be carried out based on freely agreed conditions.

Flash Battery's Suppliers must reject any knowing use of forced and compulsory labour, as well as any form of modern slavery and human trafficking. Employment relationships must be agreed on a voluntary basis and can be terminated at employees' discretion within a reasonable notice period.

### **3.4 Ban on discrimination and harassment**

Flash Battery values diversity and inclusion and recognises the principles of dignity and equality while condemning any form of discrimination based on age, racial or ethnic origin, nationality, political or trade union opinions, religious beliefs, sexual orientation, gender identity, physical or mental disabilities and any other personal characteristic not relating to the world of work.

Similarly, Suppliers must reject any form of discrimination and harassment, and shall refrain from any form of abuse of power against their employees or contractors, drawing inspiration from the principles of dignity and equality and guaranteeing equal opportunities for everyone, in line with the provisions of any relevant ILO Conventions. Flash Battery's Suppliers must promote a social environment that encourages respect for individuals. Suppliers are also prohibited from carrying out any sexual, physical or psychological abuse, any kind of harassment or threats, physical disciplinary measures, intimidation, as well as any

inappropriate or disrespectful behaviour towards their employees or contractors.

### **3.5. Freedom of association and collective bargaining**

Flash Battery guarantees the basic right for all employees to form trade unions and employee representations and to become a member of them.

Suppliers, in turn, are required to guarantee workers' right to join trade unions and take part in collective bargaining, without distinction or discrimination and without any fear of repercussions, pursuant to applicable laws and regulations.

In countries where this right is restricted by local laws, legitimate alternative options for employee participation must be supported.

### **3.6 Health and safety**

Flash Battery is committed to promoting, sharing and strengthening a culture of workplace safety, while respecting laws and regulations aimed not only at preventing any risks, but also at improving employee health and safety.

Occupational safety includes all the measures, means and methods to minimise or eliminate work-related risks for employee health and safety.

Suppliers are required to comply with existing legislation, as well as with any regulations and procedures adopted by Flash Battery on health and safety, guaranteeing that their employees and contractors have a safe, hygienic and healthy working environment,

taking into account the sector they work in and the risks associated with any work and operations carried out. In accordance with the ILO Convention on health and safety, Suppliers shall make continuous efforts to adopt any measures and provisions required to provide and maintain a safe and healthy working environment for all workers, managing any risks identified, while organising and implementing suitable preventive measures, assessing the effectiveness of these measures and seeking continuous improvement. All workplace health and safety measures must be free of charge for employees (ILO Convention 155).

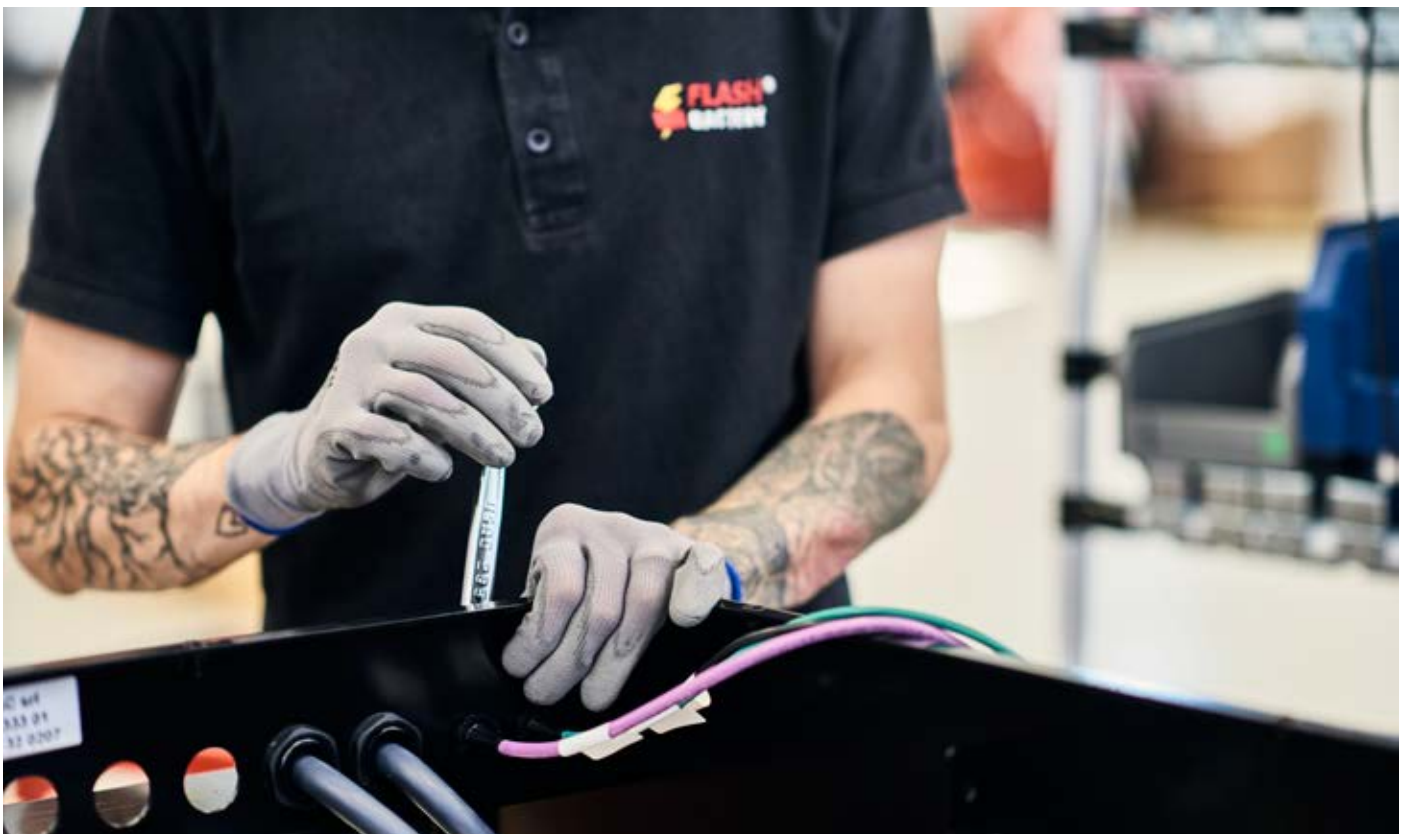
Suppliers are required to develop a sustainable health and safety culture at the company, avoiding any illegal or dangerous behaviour and carrying out regular inspections to check the existence

and maintenance of adequate health and safety conditions for their employees and contractors at the workplace.

### **3.7 Working hours and remuneration**

Flash Battery complies with staff management legislation, providing fair salaries and working times and rest periods in line with applicable legislation and any relevant international standards. For Flash Battery, people are the top company asset, an essential, priceless resource for its future.

Suppliers shall ensure full respect for collective labour agreements and legislation on working hours and overtime, including breaks, rest days, holidays and leave of various kinds. If there are no legal requirements or minimum standards, the ILO international standard shall apply



of a maximum of 48 working hours per week with a rest period of at least 24 consecutive hours every seven days. According to the ILO, a maximum of 12 hours of overtime may be carried out per week, on a temporary basis and in the event of an emergency, such as urgent repairs.

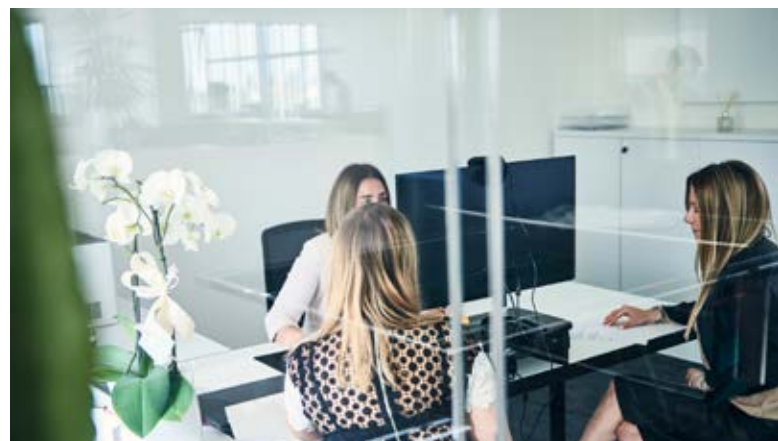
Suppliers must also guarantee that their staff get fair remuneration, which is not below the minimum set by law and by applicable collective bargaining, and is adequate to guarantee decent living conditions.

Any remuneration and benefits paid or received for a normal working week must at least correspond to the legally valid and guaranteed minimum. If there are no legal provisions or collective bargaining agreements, they must be based on common, specific local remuneration and benefits for the sector which ensure an adequate standard of living for employees and their families.

### **3.8 Legal employment conditions**

Flash Battery condemns any form of illegal employment. Suppliers are required to provide their employees and contractors with a clearly understandable and legally binding written employment contract.

Suppliers are also required to comply with forms of employment covered by applicable legislation, avoiding the use of any illegal forms of labour, including hiring workers without a valid residence permit, and they must ensure that their employees and contractors have access to social security, welfare and insurance systems in line with applicable laws and regulations, as well as with any collective agreements adopted.



## 4. Environmental protection and sustainability



### 4.1 Compliance with environmental legislation

Flash Battery is committed to respecting the environment all along the production chain, as it considers the environment a common resource to be saved for the benefit of the community and future generations with a view to sustainable development.

Suppliers are required to comply with and respect any existing standards and requirements on environmental protection and the prevention of environmental crimes, which include, among others: obtaining and maintaining environmental permits and approvals for carrying out regulated activities; managing and disposing of hazardous materials; emissions of contaminants that affect the air, water and soil; protecting natural resources and fauna; banning or restricting the use of specific substances; recycling materials and respecting environmental rights.

Suppliers must put initiatives in place to improve their environmental performance.

### 4.2 Management of resources and environmental impact

Flash Battery promotes environmental sustainability and protection, efficient use of resources and reduced consumption.

Flash Battery expects its Suppliers to use energy, water and raw materials efficiently, as well as renewable resources, and to minimise any damage to the environment and people's health, using the best technologies that help optimise use of natural and energy resources and reduce any waste of these resources, while encouraging them to be reused and recycled.

Suppliers are also required to run their business by using resources responsibly, so they do not jeopardise the needs of future generations, and to measure and keep track

of their use of energy resources, distinguishing - where possible - between those generated from renewable and non-renewable sources. Suppliers must also actively seek to limit their energy consumption and to improve the efficiency of their operations, reducing any relative emissions of greenhouse gases into the atmosphere and helping achieve national and international emission reduction targets.

Suppliers are also required to use water resources responsibly, to actively seek to adopt appropriate measures to minimise water withdrawals, to provide incentives for reusing water and to improve waste water management. Any use of hazardous substances by Suppliers must comply with legal requirements, in particular, they must ban the use of nationally and internationally prohibited substances if they are harmful to people or the environment, and put appropriate measures in place for the management, storage and transport of hazardous substances.

### **4.3 Waste management**

Flash Battery promotes responsible and sustainable waste management. In the development, production and life-cycle of products as well as in the subsequent end-of-life recycling, as with other activities, Suppliers are required to manage waste responsibly and sustainably, by reusing resources, recycling and the safe, environmentally sound disposal of residual waste, chemicals and waste water.

Suppliers are required to comply with existing laws and regulations on the management of hazardous and non-hazardous waste, ensuring the correct treatment, storage,

transport and disposal of this waste. Furthermore, Suppliers must request and be in possession of information on the treatment, transport and destination of any waste generated in all phases of the production process.

### **4.4 Protection of biodiversity**

Flash Battery protects high conservation value areas and promotes biodiversity.

Suppliers are required to adopt any necessary measures to guarantee that biodiversity is preserved in all their activities and in the entire supply chain. Suppliers must keep supporting documents on the history of land use and shall be required to provide them upon request.

## 5. Implementation and supervision



### 5.1 Right to check and monitor

Flash Battery has the right to check compliance by Suppliers, and by all the companies in the Supplier's Group, with the obligations in this Code of Conduct, using the verification procedures which it considers most appropriate for this purpose.

These verification processes may involve inspections by Flash Battery and/or third parties appointed by the company at the Supplier's place of work. Any potential inspections shall be carried out with respect for intellectual property and confidentiality and without interfering with the Supplier's work.

On-site checks/audits at the Supplier are only carried out with prior notification and in the presence of the Supplier's representatives, during normal working hours and in accordance with existing laws. In turn, as part of their relationships with Flash Battery, Suppliers shall monitor that

conduct is upheld in accordance with the principles of this Code of Conduct, as well as with existing legislation.

### 5.2. Management of breaches and/or non-compliance with the code of conduct

Any inappropriate behaviour must be identified, addressed and immediately corrected.

This requires everyone to be vigilant and willing to draw attention to potential serious regulatory breaches based on solid proof. If Suppliers identify potential cases of non-compliance with the Supplier Code of Conduct, they are required to promptly report it to Flash Battery, following the procedure below, and to take any necessary corrective actions to adjust their work and operations, requesting – if deemed appropriate – Flash Battery's help to identify and agree on the most appropriate methods and timeframes.

Similarly, if Flash Battery becomes aware of any breaches and/or conduct that does not

comply with this Code of Conduct by the Suppliers or companies in their Group, then Flash Battery shall be entitled to request that appropriate corrective actions are put in place within a reasonable period of time. Suppliers must resolve any non-compliance encountered at no cost to Flash Battery. Flash Battery reserves the right to suspend any relationship and/or to terminate any contractual agreement with any Suppliers that refuse to identify and/or carry out the aforementioned corrective measures, without prejudice to its right to claim compensation for any damage potentially suffered.

Notwithstanding the above, if there is a serious and/or repeated breach or non-fulfilment by the Supplier of the provisions in this Supplier Code of Conduct, Flash Battery shall be entitled to temporarily suspend the Supplier or, where it deems appropriate, to terminate any contractual agreement by right with the defaulting Supplier, and also to claim compensation for any direct damages suffered.

### **5.3 System for reporting breaches and whistleblowing**

Flash Battery encourages people to send reports in good faith regarding alleged or proven breaches of the provisions of this Supplier Code of Conduct.

For any information requests about this Code of Conduct, including its interpretation and application, please contact the Flash Battery representatives directly involved in handling the existing business relationship.

Alternatively, notification of an alleged or proven breach of this Supplier Code of

Conduct may be sent through the various reporting channels set up by Flash Battery in accordance with Whistleblowing legislation, and more specifically:

- The “My Whistleblowing” online platform is available on the website and can be accessed by all stakeholders at the following link:  
<https://areariservata.mygovernance.it/#!/WB/FlashBattery>
- Ordinary post, following the procedure indicated in the ANAC Guidelines (Resolution 311 of 12 July 2023): (c/o the lawyer Paola Prati, Via Vittorio Veneto n. 5, Reggio Emilia)
- Orally/verbally by requesting a confidential face-to-face meeting with the Manager at the law firm of Paola Prati, Via Vittorio Veneto n. 5, Reggio Emilia (tel. +39 0522 433742).

Any reports received shall be treated confidentially and secretly, except where required by law, and without any form of reprisal.

The “Whistleblowing Procedure”, which can be found on the respective landing pages of the reporting channel, covers how the internal reporting channel works and how reports are handled, as well as any possible applicable disciplinary sanctions in the event of improper conduct or actions in bad faith by the individuals involved in the reporting system.

This general principle does not prevent or restrict any potential whistleblowing obligations that might arise following reports, with respect to the Judicial Authorities or any other competent authorities.

## ACCEPTANCE FORM

FLASH BATTERY aims to promote ethical, long-standing relationships with its Suppliers in order to facilitate and maintain a fair, sustainable and reliable supply chain.

By signing this form, Suppliers confirm that they:

- have received, studied and understood the provisions of the Code of Conduct, which constitutes an essential requirement of the contractual and/or commercial relationship with FLASH BATTERY;
- shall comply with FLASH BATTERY's Code of Conduct and with any applicable local, national and international laws and regulations covering their work and operations;
- shall inform, by all means necessary, their employees, suppliers, external contractors and any other individuals involved in the commercial relationship with FLASH BATTERY of the contents of this Code of Conduct and shall ensure that they also comply with its provisions;
- shall make every appropriate effort required to guarantee the compliance of their work and operations with the principles and rules of conduct established in this Code, with a view to continuous improvement and sustainable development for their business;
- shall accept any monitoring activities put in place by FLASH BATTERY;
- shall implement the necessary corrective actions, in the event of any non-compliance of their work and operations following the potential monitoring put in place by FLASH BATTERY;
- shall promptly notify FLASH BATTERY of any alleged or proven cases of breaches of this Code of Conduct following the procedure described herein.

Place \_\_\_\_\_ Date (dd/mm/yyyy): \_\_ / \_\_ / \_\_\_\_

Company name: \_\_\_\_\_

Legal representative: \_\_\_\_\_

Signature of the legal representative or person granted the necessary powers: \_\_\_\_\_





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