CODE OF ETHICS

AB&S Avvito S.r.l. · November 2026 edition

1 Why this code

We supply fasteners for plants, machines and structures that must operate safely and last. We expect the same reliability from ourselves and from the companies we work with.

This code sets out the rules on ethics, social responsibility and environmental protection that AB&S Avvito promotes, for itself and for its suppliers, and asks its suppliers to follow. It is inspired by the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the Women's Empowerment Principles.

2 Who it applies to

The code is addressed to all suppliers of AB&S Avvito. Each supplier applies it in its own company and has it applied by its own suppliers and subcontractors, throughout the supply chain.

If a supplier does not comply with the code, AB&S Avvito may end the business relationship, as permitted by the applicable law and to protect its rights.

3 Work and human rights

- **Child labour.** Employing anyone under 16 is prohibited. Where national law sets a higher minimum age, or compulsory schooling lasts beyond 16, the higher age applies.
- **Irregular work.** The supplier does not use illegal, clandestine or undeclared work and complies with the laws that prevent it.
- **Respect for people.** Employees are treated with respect and dignity. Harassment and abuse are not tolerated in any form.
- **Equal opportunities.** The supplier ensures equal opportunities and discriminates against no one on grounds of sex, age, ethnic origin, religion, disability, sexual orientation, political opinions or any other personal status.
- **Pay.** The supplier pays wages regularly, pays the social contributions required by law and pays overtime at the rates required by law.
- **Working hours.** Working hours comply with national law and with the standards of the International Labour Organization (ILO).
- **Freedom of association.** The supplier recognises the right of employees to join freely a trade union or other representative body and to take part in collective bargaining.
- **Health and safety.** The supplier provides safe and healthy workplaces: it reduces risks, trains its staff and complies with local and international safety rules.

4 Environment

AB&S Avvito promotes environmental protection and works with suppliers committed to reducing their impact through good practice, clean technologies and compliance with international environmental rules. In particular, we expect from our suppliers:

- an environmental management system;
- better environmental performance of their resources and sites, especially in waste disposal, water and energy consumption and the management of hazardous chemicals;
- measures to conserve biodiversity;
- good environmental practice throughout the production chain;
- better environmental performance over the whole life cycle of products.

5 Business integrity

- **Laws.** The supplier complies with the local, national and international laws that apply to its business.
- **Corruption.** AB&S Avvito has zero tolerance for corruption and influence peddling in any form. The supplier complies with anti-corruption laws and takes measures to prevent, detect and sanction any case of corruption or influence peddling, direct or indirect, in its sector.
- **Conflicts of interest.** The supplier complies with the relevant rules and avoids situations that could create a conflict of interest in its relationship with AB&S Avvito.
- **Competition.** The supplier complies with competition law in the countries where it operates. Abuse of a dominant position, cartels and any unlawful agreement between competitors are prohibited.
- **Confidentiality.** The supplier takes the necessary measures to protect professional secrecy and any non-public information received in its relationship with AB&S Avvito.
- **Personal data.** The supplier complies with data protection laws.
- **Customs and security.** The supplier complies with the applicable customs and security rules.
- **Sanctions and exports.** The supplier complies with trade restrictions, international sanctions and export control rules, and keeps up with changes to them.
- **Gifts and hospitality.** They are allowed only if transparent, of modest value and in line with local law. They must never create a risk of corruption or unlawful practice.
- **AB&S Avvito assets.** The supplier protects the assets of AB&S Avvito, including intellectual property, prevents counterfeiting and follows the instructions it receives for handling rejected products.
- **Public statements.** The supplier does not speak publicly on behalf of AB&S Avvito, or in a way that suggests it does, and uses online channels responsibly, respecting privacy and professional secrecy.
- **Transparency.** The supplier gives clear and accurate information about the methods and resources it uses.

6 Checks

AB&S Avvito may check compliance with this code, including through audits at suppliers' premises. The supplier provides the information requested and gives access to the AB&S Avvito representatives

carrying out the check.

If shortcomings emerge, the supplier undertakes to correct them and improve. AB&S Avvito may help it introduce good practice and resolve minor non-conformities.

The supplier keeps accurate records and keeps track of what it does to comply with the code.

7 Questions and reports

For any question about this code, or to report conduct that does not comply with it, write to **commerciale@absavvito.it** or to AB&S Avvito S.r.l., Strada del Francese 93, 10156 Turin, Italy.