

SUPPLIER CODE OF CONDUCT

1.	INTRODUCTION.....	3
2.	RECIPIENTS AND SCOPE OF APPLICATION	3
3.	LABOUR STANDARDS AND SOCIAL RESPONSIBILITY	4
3.1.	No child labour, forced or coerced labour.....	4
3.2.	Prohibition of illegal, clandestine and undeclared work.....	4
3.3.	Prohibition of harassment, abuse and discrimination of any kind	4
3.4.	Remuneration.....	5
3.5.	Working hours.....	5
3.6.	Freedom of association and right to collective bargaining.....	5
3.7.	Safe and healthy working conditions and adequate training for workers	5
3.8.	Protection of local communities	6
4.	ENVIRONMENTAL PROTECTION AND SUSTAINABILITY.....	6
5.	BUSINESS ETHICS AND INTEGRITY.....	7
5.1.	Prohibition of all forms of corruption	7
5.2.	Prevention of conflicts of interest.....	7
5.3.	Gifts.....	8
5.4.	Anti-money laundering	8
5.5.	Respect for competition.....	8
5.6.	Confidentiality	8
5.7.	Personal data protection	8
5.8.	Trade restrictions and international sanctions	9
5.9.	Public statements	9
5.10.	Transparency of information.....	9
6.	IMPLEMENTATION AND MONITORING	9
7.	CONTROL AND ACCESS TO INFORMATION	10
8.	WHISTLEBLOWING.....	10
9.	MANAGEMENT OF CASES OF NON-COMPLIANCE	10

1. INTRODUCTION

STAR7 recognises the importance of ensuring high standards in terms of ethics, integrity and social responsibility and is committed in its activities to complying with international principles, laws and national and international standards in force, as well as to adopting best practices, especially with regard to labour standards, environmental protection, corporate responsibility and sustainability.

To this end, STAR7 has decided to adopt the Supplier Code of Conduct (the “Code”), containing ethical principles and rules of conduct that are in addition to the legal, regulatory and procedural requirements for business relationships between STAR7 and its partners.

For STAR7, it is extremely important to ensure that its Suppliers and subcontractors (collectively “Suppliers”) share and adopt the same respect for applicable laws, regulations and conventions, as well as ethical and business principles, in the management of their businesses.

STAR7 therefore requires its Suppliers to strictly comply with these standards. It is STAR7's firm intention to collaborate only with Suppliers that agree to comply with the requirements of this Code and the principles stipulated by the International Labor Organization Conventions, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Principles of Women's Empowerment, and that agree to ensure that their Suppliers do the same in carrying out their activities for STAR7. Adherence to this Code of Conduct is therefore an essential condition for initiating and continuing any business relationship with STAR7. In the event of a breach of the principles and commitments contained herein, STAR7 reserves the right to take any measures it deems appropriate, including termination of the collaboration.

At STAR7, we believe that partnership and collaboration with our suppliers are a mutually beneficial and inclusive way to ensure that responsible sourcing principles are applied throughout the value chain. We are committed to collaborating with our Suppliers with a view to constant improvement and we firmly believe that this brings common and shared benefits for us, our suppliers and the communities in which we operate.

This Code of Conduct allows us to engage with our Suppliers and to ensure a fair, sustainable and transparent supply chain.

2. RECIPIENTS AND SCOPE OF APPLICATION

The recipients of this Code are STAR7's Suppliers of materials, services and finished products (including, but not limited to, Service Providers, manufacturers, collaborators, lessors and any third party that has a relationship with any company within the STAR7 Group).

Recipients are responsible for ensuring their compliance with the Code, as well as disseminating it and requiring compliance by their employees, suppliers, external collaborators and other persons who are involved in STAR7's supply chain.

3. LABOUR STANDARDS AND SOCIAL RESPONSIBILITY

STAR7 requires its Suppliers to conduct themselves up to the highest standards of social responsibility. Suppliers are required to ensure compliance with the contents of the following paragraphs.

3.1. No child labour, forced or coerced labour

Work by minors under 16 years of age is strictly prohibited. In countries where local laws establish a higher age for child labour or an age for completing compulsory education over 16, the older age applies. Workers under the age of 18 must not work overtime or do hazardous work, or work night shifts. Suppliers may use legal, legitimate and properly managed on-the-job apprenticeship programmes, such as student internships.

STAR7 does not tolerate any form of unfair or illegal work in its supply chain, such as forced labour or human trafficking. Any form of forced labour, slavery, servitude or human trafficking by Suppliers, as well as the seizure of identity documents or the denial of work permits, demanding workers pay a security deposit, or the use of any other constraint, is strictly prohibited. All workers have the right to accept or leave employment freely. Suppliers must respect the freedom of movement of workers. Suppliers cannot ask employees to work to settle a debt contracted with them or with a third party.

3.2. Prohibition of illegal, clandestine and undeclared work

Suppliers must comply with all applicable regulations as outlined by the International Labor Organization Conventions, to prevent illegal, clandestine and undeclared work.

3.3. Prohibition of harassment, abuse and discrimination of any kind

Suppliers are required to treat their employees with respect and dignity. Suppliers must avoid and prohibit any behaviour and practice that involves any form of corporal punishment, physical, sexual, verbal or mental harassment, or any other type of abuse.

STAR7 expects its Suppliers to ensure fair and correct treatment of all employees. Suppliers may not discriminate – in particular with regard to pay, recruitment, access to training, promotion, maternity protection and dismissal – based on sex, race or ethnic origin, religion, age, disability, sexual orientation, political affiliation, trade union membership, nationality, gender identity, descent or social background.

3.4. Remuneration

Suppliers must remunerate their employees and collaborators in accordance with applicable laws and regulations, as well as with the collective agreements in force. Wages must be sufficient to meet the basic needs of workers and to provide an income and standard of living that respects the dignity of the individual. STAR7 requires its Suppliers to ensure that all employees receive benefits required by applicable law or in applicable collective agreements, corporate agreements, and other applicable individual or collective negotiated agreements.

3.5. Working hours

Suppliers must comply with all applicable local laws and regulations regarding working hours, which must under no circumstances exceed the maximum limit established by internationally recognised standards, such as the International Labor Organization. Suppliers may not impose an excessive number of overtime hours. The total number of hours worked per week, including overtime, cannot exceed legal limits. Employees have the right to at least a minimum number of days off, established by applicable laws, and must have at least one day off over a seven-day period.

3.6. Freedom of association and right to collective bargaining

STAR7 requires its Suppliers to respect freedom of association and the right to collective bargaining, which must be recognised and facilitated, without any sanction, discrimination or harassment against their workers. Where applicable, Suppliers must provide worker representatives with appropriate means to exercise their rights. Intimidation, threats and discriminatory practices against worker representatives are prohibited.

3.7. Safe and healthy working conditions and adequate training for workers

In line with health and safety policies, Suppliers are required to offer their workers a safe and healthy work environment that protects their health and safety, in order to avoid accidents, bodily injuries or dangerous exposures, which may be caused, related to or resulting from their work, even when equipment and chemicals are used, or during business trips. Suppliers are required to establish procedures and provide appropriate training. They are strictly required to adopt preventive and protective measures in order to identify, avoid and reduce as much as possible any danger that represents a risk to the health, hygiene and safety of personnel and the environment. Suppliers are required, at a minimum, to comply with all applicable local and international regulations and laws in this regard. Health and safety instructions must be in place and amply communicated. Compliance by workers must be evaluated regularly. Employees must be equipped with protective equipment appropriate to their activities. The same principles apply to accommodation offered by Suppliers.

3.8. Protection of local communities

As a responsible group that operates worldwide, STAR7 is committed to exercising a positive influence on the companies and regions in which it works, to prevent any harm to local communities, and requires its Suppliers to do the same.

4. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

STAR7 is committed to protecting the environment and encourages Suppliers to take initiatives aimed at reducing the impact of their activities, especially through the use of green technologies, and to share, where necessary, environmental data.

STAR7 requires that its Suppliers comply with applicable local and international environmental laws, regulations and best professional standards, that they obtain all necessary environmental authorisations and that they are able to prove the effective implementation of the following measures:

- Compliance with local and international environmental laws
- Adoption of policies and procedures to minimise the environmental impact of their activities
- Promotion of the efficient use of resources and the use of renewable energy
- Responsible and sustainable waste management
- Use of raw materials, components and products that meet the highest environmental and quality standards
- Guaranteed safe management of chemicals and the compliance of products and raw materials with current, national and international regulations, to the highest professional standards
- Preservation of biodiversity and guarantee of compliance with relevant international environmental standards and regulations
- No illegal deforestation and zero deforestation in high-risk areas
- Guarantee of traceability, sharing of information on the origin of raw materials and compliance of raw materials and substances used
- Adoption of measures throughout the supply chain that guarantee respect for animal welfare

STAR7 encourages the improvement of the environmental performance of production sites and resources, in particular through proper waste management, the prevention of air, wastewater and soil pollution (including groundwater), the reduction of greenhouse gas emissions, the use of renewable energy and the reduction of water and energy consumption.

Suppliers must be able to prove that they have taken measures to ensure that workers, whose activities have a direct impact on the environment, are trained and qualified, and that they have the necessary resources to carry out their work effectively in view of these environmental commitments.

5. BUSINESS ETHICS AND INTEGRITY

STAR7 requires exemplary integrity in carrying out business activities.

Suppliers are required to operate with the utmost integrity, transparency and honesty, taking effective measures to prevent any form of corruption, money laundering or trafficking in illegal influences. Suppliers must also strictly comply with competition and antitrust laws, ensuring honest and fair competition. The protection of personal and business data, as well as the confidentiality of information handled, are essential and a priority.

STAR7 Suppliers must:

- Conduct their activities with integrity, transparency and honesty
- Prevent any form of corruption, including money laundering and the payment of bribes
- Comply with competition and antitrust laws
- Protect the confidentiality and security of personal and business data
- Respect intellectual property rights

5.1. Prohibition of all forms of corruption

STAR7 applies a zero-tolerance policy on corruption and trafficking in illegal influence. STAR7 expects its Suppliers to take appropriate measures to prevent, detect and punish any form of corruption or trafficking in illegal influence, directly or indirectly, as part of their activities. This includes the prohibition of so-called facilitation payments or other benefits offered to public officials for non-discretionary actions in the ordinary course of their work.

5.2. Prevention of conflicts of interest

STAR7 requires its Suppliers to make every effort to prevent the occurrence of situations that create an actual, perceived or potential conflict of interest within their business relationship with any member of STAR7, following rules of fairness and impartiality.

Recipients are required to avoid situations of actual or potential conflict of interest and to report any circumstance that creates, or seems to create, illegitimate favouritism, collusive practices or choices that may entail illegitimate advantages.

5.3. Gifts

Gifts can be considered acceptable expressions of courtesy in the context of a good business relationship, provided they are of limited scope and value, offered in a transparent manner, permitted by applicable laws and regulations, customary in the place where they are donated, offered to show esteem or gratitude, and without expecting them to be returned. In some cases, these practices may be subject to anti-corruption regulations or other legal requirements. Therefore, it is essential that Suppliers commit to complying with applicable rules and regulations as part of their business relationship with any member of STAR7.

5.4. Anti-money laundering

STAR7 requires its Suppliers to take all appropriate measures to prevent their activities from being used as tools for money laundering, self-laundering and the financing of criminal activities.

Recipients are required to avoid engaging in or maintaining commercial or financial relationships in cases where there is reasonable doubt that counterparties may carry out actions constituting the crime of money laundering.

5.5. Respect for competition

Suppliers undertake to take all appropriate measures to prevent abuses of a dominant position, agreed practices or illegal agreements between competitors, such as the determination of prices or price ranges (price setting), market distributions or boycotts that restrict the production of certain products.

5.6. Confidentiality

STAR7 requires its Suppliers to undertake to take all necessary measures to ensure the confidentiality of trade secrets and other non-public information received during their business relationship with STAR7.

5.7. Personal data protection

STAR7 requires its Suppliers to take all appropriate measures to comply with all applicable laws and regulations regarding the protection of personal data.

5.8. Trade restrictions and international sanctions

STAR7 requires its Suppliers to comply with all applicable international trade restrictions and economic and financial sanctions, taking into account any changes to these measures, as well as all applicable laws, customs rules and regulations regarding export and import controls.

5.9. Public statements

STAR7 expects its Suppliers to be extremely attentive to their public statements, in particular on the Internet, on social media and in printed media, to ensure that none of these statements are attributed to any company belonging to STAR7 or to its shareholders, directors, officers or employees and that they are consistent with the Suppliers' commitment to both confidentiality and respect for trade secrets.

5.10. Transparency of information

Suppliers are required to present clear and accurate information regarding the methods and resources used, the production sites and the characteristics of the products or services offered, as well as to avoid making misleading statements.

6. IMPLEMENTATION AND MONITORING

Suppliers are required to implement effective systems to ensure compliance with this Code.

Suppliers must effectively communicate the principles and values contained in this Code at all levels of their organisation and supply chain. Regular staff training is crucial to ensure the understanding and implementation of these principles, thus ensuring a shared commitment to social responsibility and sustainability.

STAR7 reserves the right to verify compliance through audits and inspections; in the event of non-compliance, STAR7 will request a corrective action plan and may withdraw from contracts if violations are not adequately resolved.

7. CONTROL AND ACCESS TO INFORMATION

At the request of STAR7, Suppliers must provide periodic reports to demonstrate compliance with this Code.

STAR7 expects its Suppliers to ensure that they have adequate and effective management systems, policies, procedures and training plans, to ensure that this Code is constantly respected.

Suppliers must submit any required supporting documentation or information that certifies full compliance with this code.

8. WHISTLEBLOWING

STAR7 has created a secure Whistleblowing platform to inform the Supervisory Body about personnel of the STAR7 Group and/or of third parties violating laws and regulations, the Group's Code of Ethics and Conduct, the Compliance Programme, as well as the system of rules and procedures in force in the STAR7 Group.

Thanks to the proactive and accountable engagement of suppliers in reporting any behaviour that does not comply with our standards, the company can swiftly detect any irregularities. This allows us to promptly implement the required corrective actions, thereby preventing any financial or reputational harm.

All communications are treated securely and confidentially.

9. MANAGEMENT OF CASES OF NON-COMPLIANCE

This Supplier Code of Conduct is an integral part of the supply contracts and Purchase Orders entered into with STAR7. If a Supplier does not comply with this Code, STAR7 reserves the right to request the correction of violations, suspend purchases, refuse delivery related to any purchase order and return any of the Supplier's merchandise, until the non-compliances have been rectified.

Suppliers are required to implement effective management systems to ensure full adherence to this Code of Conduct. STAR7 reserves the right to conduct audits and inspections to verify compliance and, in case of non-compliance with the required standards, to request corrective action plans. If the non-compliance persists, STAR7 may evaluate the termination of the contractual relationship, in addition to exercising any other right or claim for compensation.

