

**SUPPLIER CODE  
OF CONDUCT**





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# INTRODUCTION TO AMPLIFON'S SUPPLIER CODE OF CONDUCT

## Purpose, values, and areas of commitment

At Amplifon, *we empower people to rediscover all the emotions of sound*. In pursuing this purpose, we are committed to carrying out fair, honest, ethical, and responsible business worldwide based on the values on which our activities are founded:

- **Customer devotion:** to serve our customers' best interests with passion and seek to surprise them by always going the extra-mile;
- **Personal impact:** to empower our people to think freely, perform and succeed, working together to make a lasting difference;
- **Everyday excellence:** to take accountability for setting and delivering the highest standards of quality, and never give up;
- **Forward thinking:** to listen to the world and embrace every challenge with the ambition to learn, grow and innovate with speed and agility;
- **Acting responsibly:** to do well by doing good, working with integrity, and showing respect to everyone, every time.

These founding values, that constitute the very roots on which we base our everyday operations, are summarized in our Code of Ethics and Sustainability Policy, both publicly available on [Amplifon's corporate website](#).

Moreover, our Sustainability Policy sets the Group's sustainability priorities and commitments towards its stakeholders, namely *Product & Service Stewardship, People Empowerment, Community Impact* and *Ethical Behavior*. Particularly, through the *Ethical Behavior* commitment, we aim to encourage ethical and sustainable practices all along the value chain, and we expect all our business partners and suppliers to help us deliver such commitments towards responsible business conduct at all levels.

## Scope of application

Through the present Supplier Code of Conduct ("**SCoC**"), available on [Amplifon's corporate website](#), we aim to share with our suppliers and business partners Amplifon's standards and principles towards responsible business conduct. We require all our suppliers, both for direct and indirect procurement, and our business partners to comply with all applicable laws and regulations in the countries in which they operate, as well as to commit to the minimum standards and principles set out in this Supplier Code of Conduct by actively doing their utmost to achieve such standards.

The SCoC aims at strengthening the commercial relationship that exists between Amplifon and our suppliers beyond mere compliance terms. For this reason, we require our suppliers and business partners to have these standards incorporated into their own operations, their procedures and business practices, to adopt and embrace them as well as to pass them through to their respective workforce, suppliers, and stakeholders as appropriate.

## GENERAL TERMS

At Amplifon, we aim at strengthening the relationship we hold with our suppliers in order to build sound, long-lasting partnerships for the responsible management of the supply chain.

Therefore, suppliers:

- agree and undertake to comply with all the minimum standards and principles of good conduct set out in this SCoC, as the fundamental basis for a long-lasting business relationship with Amplifon;
- agree that Amplifon, or a third party appointed by Amplifon, may request at any time additional data, or may carry out assessments, and possibly audits, in accordance with any arrangements, agreements, or contracts with Amplifon S.p.A. and its subsidiaries in order to assess the compliance with the minimum standards and principles of good conduct set out below;
- shall cascade such minimum standards and principles of good conduct throughout their supply chain, suppliers and sub-suppliers, their employees, agents, subcontractors and relevant business partners to the extent they are involved in the provision of goods and/or services to Amplifon S.p.A. and its subsidiaries.

## MINIMUM STANDARDS AND PRINCIPLES OF GOOD CONDUCT

### 1. Business ethics and compliance

Suppliers shall conduct their business in full respect of high ethical standards, considering the principles and values stated in Amplifon's Code of Ethics. In particular, suppliers shall guarantee:

#### 1.1. Compliance with Law:

suppliers undertake to comply with all applicable laws, regulations, agreements, as well as understand and agree to be compliant with the standards which are relevant where they operate, whether they are national, regional, or international;

### **1.2. Fair competition:**

suppliers are expected to conduct their business in line with the principles of fair competition and fair-trade practices, in compliance with all applicable laws and regulations regarding, *inter alia*, anti-competitive behavior, anti-trust and monopoly practices, as well as to avoid any situation in which a potential conflict of interests could arise;

### **1.3. Anti-corruption and anti-bribery:**

suppliers shall not ask for, engage in, make offer, promise, pay, authorize, accept, and request directly or indirectly money (including bribes and/or facilitation payments) or other benefits aimed to obtain an undue advantage (i.e., to obtain and retain business or influence decisions), whether the undue advantage is offered directly or through an intermediary, in line with Amplifon's Anticorruption Policy;

### **1.4. Business integrity and transparency:**

suppliers are expected to perform all business and commercial agreements and transactions transparently and record them accurately in their books and records according to applicable laws, and shall not engage in or facilitate any form of money laundering and not use confidential information to engage in or support insider dealing;

### **1.5. Privacy and intellectual property rights:**

suppliers shall respect intellectual property rights of third parties and process personal data and information of data subjects according to all applicable laws, regulations, and best practices by implementing the required technical and organizational measures on a risk-based approach;

### **1.6. Conflict minerals management:**

only if applicable, suppliers involved in the production of goods shall monitor the utilization and origin of the materials regulated by the EU Conflict Minerals Regulation, and all other applicable regulations and laws.

## **2. Health, safety, and workers' rights**

Suppliers shall treat all employees, external collaborators, and their own suppliers with respect for people's fundamental dignity, ensuring their health, safety, and basic human rights. Suppliers shall particularly focus on:

### **2.1. Children's rights:**

suppliers shall recognize the high importance of children's human rights and will not engage in or allow child labor within their business activities or in those of their own suppliers. Furthermore, suppliers shall guarantee the minimum age for employment is respected for all their direct or indirect, full time or part time employees and collaborators as foreseen by the ILO (International Labor Organization) principles and/or applicable national laws;

### **2.2. Forced labor:**

suppliers shall not use forced or bonded labor or involuntary prison labor and shall ensure compliance with laws and regulation related to the elimination of slavery and human trafficking. All workers shall

work freely and shall be paid regularly as agreed. Physically abusive disciplinary practices are not tolerated;

**2.3. Diversity & Inclusion, non-discrimination, and no harassment:**

suppliers will respect cultural and individual diversity and promote inclusiveness at all business levels, by employing and rewarding employees based on the principle of equal opportunity and making employment decisions based only on factors such as qualification, performance, competencies, and potential. Suppliers shall ensure that all their employees are equally and fairly treated, and not subject to any kind of discriminatory treatment concerning race, nationality of origin, gender, age, physical characteristics, social origin, disability, trade union membership, religion, civil status, pregnancy, sexual orientation, gender identity and/or expression or any other personal characteristic. Suppliers shall not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse or threats in the workplace;

**2.4. Fair working hours and salaries:**

suppliers shall comply with applicable local laws and regulations concerning working hours and overtime, ensuring that employees' working hours do not exceed the maximum daily limit set by the applicable laws. Moreover, suppliers shall pay its employees fair wages for work performed, and a minimum wage is to be considered as pre-condition. Remuneration and benefits shall be paid in accordance with all applicable laws and regulations to promote the material well-being of employees;

**2.5. Health and safety:**

suppliers are expected to protect the health and safety of their personnel and contractors while minimizing any adverse work condition through maintaining appropriate safety systems and effective controls and trainings as provided by applicable laws and regulations. Also, suppliers shall implement safe and healthful work practices in order to prevent injuries and work-related health illnesses as provided by ILO principles, as well as maintain emergency procedures to respond to health emergencies, accidents, and medical care;

**2.6. Freedom of association and collective bargaining:**

suppliers shall ensure the respect of employees' legal rights to collective bargaining and freedom of association or, where not applicable, to promote a meaningful social dialogue with workers representatives.

## 3. Environmental Protection

Suppliers shall minimize to the extent possible the environmental impact of their business operations, and in particular focus on:

**3.1. Environmental compliance and performances:**

suppliers shall be compliant with applicable environmental laws and regulations and obtain required environmental permits, as well as measure, monitor and review their environmental performances and make continuous improvement to minimize environmental impacts and mitigate environmental risks;

### **3.2. Energy, climate action and pollution:**

suppliers commit to make efforts to minimize use of energy and improve energy efficiency as well as take the necessary measures to reduce both Greenhouse Gas emissions to mitigate climate change and other emissions that contribute to air pollution, as provided by applicable laws and regulations;

### **3.3. Water management:**

suppliers commit to take the necessary measures to minimize the use of water resources, reduce water spill and properly manage wastewater discharge as provided by applicable laws and regulations;

### **3.4. Waste management and circular economy:**

suppliers commit to manage the treatment and disposal of waste in an appropriate manner, in accordance with applicable laws and regulations, as well as to reuse and recycle materials whenever possible;

### **3.5. Ecosystem and biodiversity:**

suppliers shall take appropriate steps to ensure the preservation and safeguard of ecosystems and biodiversity across their entire value chain and make efforts to use resources from renewable sources whenever possible.

## **FINAL PROVISIONS**

### **Implementation, compliance & monitoring**

The implementation and the compliance with Amplifon's SCoC by new and existing suppliers are ensured and monitored by Amplifon based on the following actions:

- Every new supplier must acknowledge Amplifon's Supplier Code of Conduct, along with Amplifon's Code of Ethics, during the qualification phase in order to be approved as a supplier or business partner;
- Existing suppliers are required to confirm adherence to the SCoC according to an internal roll-out plan.

Amplifon reserves the right to undertake assessments and possibly audits, at its own discretion, with each and every supplier, to verify the compliance with the requirements of this SCoC, also requesting and obtaining the related evidence.

In the event of non-compliance with the standards and principles set out in this SCoC, Amplifon (at its own discretion) may decide to support the supplier in identifying corrective actions to be implemented (at the supplier's care and costs) within an appropriate timeframe. Should the supplier's non-compliance issues be particularly severe or should the supplier not remediate any non-compliance properly or timely, this may constitute a material breach of the supplier's contractual obligations, in which case Amplifon will be entitled to take all the appropriate actions.



## Contacts and further information

To give all the recipients of this SCoC an active role in the reporting process, we strongly recommend and encourage our suppliers, including their employees, to speak up immediately if they have any concerns regarding any possible violation of the minimum standards and principles set out in this Supplier Code of Conduct.

Reports may be submitted at the following email: **scoc@amplifon.com**.

The email above can also be used in case of questions about the contents of the SCoC or for further guidance or support to ensure compliance.

## SCoC approval and revisions

Amplifon's Supplier Code of Conduct was approved by the Board of Directors of Amplifon S.p.A. on March 3<sup>rd</sup>, 2022.

The Company reviews the SCoC periodically to ensure its adoption and implementation and to guarantee that it reflects developments in relevant legislations and regulations as well as application of best practices.

**amplifon**