



Professional Refrigeration

## UCINQUE SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct is supplemental to any contract which governs the supply of goods or the provision of services between a supplier and Ucinque Srl and is not intended to conflict with or modify the terms of any such contract. In the event of a conflict, the terms of the contract shall prevail.

## Ucinque Srl Supplier Code of Conduct

### 1. Introduction

Ucinque Srl (“Ucinque”) is an Italian company, manufacturing and selling refrigerated equipment with its brand U5 to countries worldwide. We are fully aware of our responsibilities to customers and other stakeholders and continually shape our response to assess supply chain risks, working daily to meet all our legal and regulatory, ethical, environmental, social, and health and safety obligations.

We can only achieve this with the co-operation of all our supply chain partners, which we hold to the same standards as ourselves. That is the purpose of our Supplier Code of Conduct. It applies to all suppliers of Ucinque, whether suppliers of raw materials, components or services, contractors, agents, or any external party doing business with Ucinque (“Suppliers”). It enables us to engage with our Suppliers on material sustainability issues relating to their operations, and to establish minimum criteria as set out in this Supplier Code of Conduct. In enforcing this Code, we will apply a risk-based supply chain approach, putting more resources and focus on suppliers, subjects, or regions we consider to be of higher risk.

By becoming a Supplier of Ucinque, you are stating that you meet or exceed our standards and that you and your own suppliers (throughout the whole supply chain) will comply with our Supplier Code of Conduct or an acceptable equivalent. We may revise and amend our Supplier Code of Conduct from time to time. Any updates and changes will apply once communicated to you.

### 2. Our Way of Working

#### (a) Legal Compliance

Suppliers (throughout the whole supply chain) will comply with our Supplier Code of Conduct or an acceptable equivalent. We may revise and amend our Supplier Code of Conduct from time to time. Any updates and changes will apply once Suppliers shall comply with all applicable and relevant laws and regulations that govern their business operations and activities and shall have clear and effective guidelines and policies in place for their staff setting out business integrity expectations. Suppliers shall also comply with all our policies, codes of practice and standards as applicable to them. Suppliers shall have adequate procedures in place to ensure that all confidential information of Ucinque, whether business or people related, is kept confidential and secure with limited access rights on a need-to-know basis and all applicable data privacy laws, particularly the EU General Data Protection Regulation, are complied with.

Suppliers shall have in place an Information Security Management System (ISMS) aligned with the requirement of the ISO 27001:2013 Standard. Suppliers shall also implement cyber security controls to protect against the most common cyber threats and demonstrate their commitment to cyber security by certifying against the requirements of the NCSC Cyber Essentials.

#### (b) Human Rights, Ethical and Social Standards and Respect for Individuals

Suppliers shall comply with all applicable human rights laws and regulations and, in detail:

## Ucinque Srl Supplier Code of Conduct

- Treat all workers with respect and dignity and not permit harassment or labour practices which involve the harsh or inhumane treatment of workers.
- Not employ child workers for any services or products in any country and have a documented policy to prevent it.
- Support equal opportunities and not allow discrimination, including in hiring practices.
- Provide all locally required workers' benefits and written, understandable labour conditions, including the higher of minimum or living wages, overtime, and paid leave, to all workers.
- With respect to union rights, uphold the stronger of the ILO standard or applicable local social and collective action rights of workers, ensuring there is a process to raise and remediate grievances.
- Take all possible steps to prevent any instances of modern slavery and human trafficking, including indentured and bonded labour, and exploitation.
- Suppliers shall ensure that their staff can raise grievances and concerns without fear of retaliation.

### **(c) Trade Regulation**

Suppliers shall comply with all applicable laws and regulations concerning import and export, trade embargoes and sanctions, and in particular:

- Not directly or indirectly provide Ucinque with any service or material from a country, entity or person that is subject to trade sanctions or embargoes, as put in place by the UN, US or the EU.
- Comply with Ucinque's Restricted Countries of Origin List for the whole supply chain of the material(s) supplied.
- Implement appropriate due diligence, screening and compliance procedures or practices in order to ensure compliance with the above obligations.

### **(d) Health and Safety**

Suppliers shall comply with all applicable and relevant health, safety and product quality laws, regulations, and standards, and in particular:

- Provide safe and healthy working conditions for their employees, and safe and healthy living quarters adjacent to factory premises when required by local law.
- Designate the responsibility for health and safety to senior management.
- Have a health and safety policy freely available to all employees to access at any time.
- Demonstrate compliance with the policy and continuously strive to minimise accidents and risks, including regular awareness and training sessions for all employees.

<sup>1</sup> We uphold the International Labour Organization (ILO) Minimum Age Convention No. 138, which sets the basic minimum age at which a child may be employed at 15 years of age, and the minimum age for hazardous work at 18 years of age. If local minimum age law is set at 14 years of age in accordance with developing country exceptions to ILO Convention No. 138, the lower will apply. When local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies.

## Ucinque Srl Supplier Code of Conduct

<sup>2</sup> For definitions of modern slavery, human trafficking, forced labour, and other references, we refer to the ILO Forced Labour Convention No. 29.

### **(e) Fair Business Practices**

Suppliers shall comply with all applicable anti-bribery, anti-corruption and competition laws, regulations and standards, and in particular:

- Shall not be involved in any form of bribery or corruption, shall not make facilitation payments and shall not give or accept improper gifts and hospitality.
- Operate in accordance with the principles of free enterprise and fair market competition.
- Have in place adequate policies, procedures, and practices to ensure compliance with these obligations.

### **(f) Environmental**

Suppliers shall comply with all applicable environmental laws and regulations and recognise their responsibility to the local and global environment in which they operate by conducting business in a way that has minimum negative impact on the planet or natural resources, and in particular:

- Manage water, energy, and other natural resources responsibly.
- Set or work towards setting science-based greenhouse gas emission reductions targets.
- Actively measure, reduce, and report emissions, carbon footprint, waste, and water.
- Conduct regular carbon footprint analysis or Life Cycle Assessment to understand the impact of their business on the environment and act as necessary.
- Protect, maintain, and work towards reversing impact on biodiversity, wildlife and endangered species as applicable to their industry.
- Show responsibility towards the communities in which they operate and manage community impact resulting from company and factory operations.

### **(g) Supply Chain Responsibility, Transparency and Traceability**

Suppliers shall map out their supply chain and be able to provide full details including name and description of the party, location and country of origin/manufacture of the product for both their supplier and their supplier's supplier(s) (if any) to ensure full traceability and that this material is available for inspection at any time.

## Ucinque Srl Supplier Code of Conduct

### 3. Monitoring, Engagement, and Improvement

Ucinque and its Suppliers will ensure ongoing compliance with, and improvement of the Supplier Code of Conduct as follows:

- Suppliers shall have or work towards a culture of continuous improvement.
- Suppliers shall, on request, register on the Sedex database as B Member and always keep such membership active during the period of supply, assuring full linkage to Ucinque. Suppliers must fully complete the Supplier Sedex Self-Assessment Questionnaire.
- If a Supplier is identified as a high risk or strategic supplier to Ucinque, the Supplier will be required to undertake an Ethical Trading Audit against one of the described standards in the Annex. All costs for this will be borne by the Supplier.
  - Such audit shall be repeated every two (2) years and be completed by a recognised third-party audit company.
  - The audit report, corrective action plan and any non-compliances shall be uploaded onto Sedex by the auditor.
  - Any non-compliances identified will need to be closed and verified by the third-party audit company within the given timescales.

### 4. Consequences of Non-Compliance

Ucinque will work with its Suppliers to help them comply with this Supplier Code of Conduct. Ucinque will apply the key principle of "Protect, Respect and Remedy" in line with the United Nations Guiding Principles on Business and Human Rights.

Without prejudice to its contractual rights, Ucinque reserves the right to delist Suppliers and cease buying products or services from Suppliers in case of material or repeat non-compliance with this Supplier Code of Conduct. Suppliers failing to meet our minimum standards may also be subject to improvement plans deemed acceptable to Ucinque, all costs for which will be borne by the Suppliers.

Suppliers shall have suitable procedures and processes in place ensuring that any non-compliance with this Supplier Code of Conduct is discovered and that Ucinque is notified of any non-compliance without delay. Suppliers shall proactively take corrective action as necessary.

Suppliers and their staff may also report actual or suspected breaches of this Supplier Code of Conduct confidentially and anonymously (where permitted by law) to Ucinque by telephone (+39 0142 578042 207) or online: [www.ucinque.it/reports](http://www.ucinque.it/reports) .