

**CC.PUR.01**

***SUPPLIER CODE OF CONDUCT***

**(REV.N°00 - 29/09/2017)**

By signing this form, the supplier confirm to have read and accepted all the above mentioned principles, terms and conditions for what concerns the services and/or the performances or the supply to Brembo Group.

**COMMITMENT FORM**

Company name:.....

Duns:.....

Address:.....

Signatory's name:.....

Signatory's position:.....

Signatory's Email address:.....

Date:.....

Signature:.....



## SUPPLIER SUSTAINABILITY POLICY

Brembo is a company that operates in compliance with its Codes of Conduct such as the Code of Ethics, the Code of Basic Working Conditions, the Anti-bribery Code of Conduct, the Policy on Non Discrimination and Diversity and the Organization, Management and Control Model that prescribe principles and values which have fundamental role for the Group.

Brembo aims at designing, producing, selling and distributing high quality products. In the meantime, Brembo aims at sharing and disseminating behaviors in support of sustainable development, encouraging understanding and respect for diversity and building a true culture of integrity.

Brembo requires its suppliers, which are essential for the development of the Group, to adopt the same behaviors on issues such as human rights, health and safety at work, environmental protection and combatting corruption and to transfer these behaviors to their supply chain.

Brembo selection of suppliers is based not only on the quality and competitiveness of products and services, but also on environmental performance and adherence to ethical values. Those factors are a prerequisite for becoming Brembo suppliers and developing a lasting collaboration.

Suppliers Code of Conduct is based on the values contained in Brembo Codes of Conduct. It is inspired by **The UN Universal Declaration of Human Rights** (which Brembo supports in all of its spheres of influence), **the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy**, and **the OECD Guidelines for Multinational Enterprises**.

## REGULATORY FRAMEWORK

Suppliers are required to comply with current rules and standards in the countries where they operate. If local regulations are less severe than the principles contained in the Suppliers Code of Conduct, they accept to adopt, within a reasonable period of time, the measures required to comply with the principles contained in the following Code.

Suppliers are required to comply with the following principles.

## LABOR AND HUMAN RIGHTS

1. Suppliers will not use **child labor**. They will never employ any person below the age of 15, unless this is part of a government-authorized job training, training, apprenticeship program clearly beneficial to the participating person.



2. Suppliers will not use any form of **forced labor**. They will not tolerate **physically abusive** disciplinary practices. Suppliers oppose any use of **human trafficking**.
3. Suppliers recognize, respect and fully guarantee their employees' **right to work and to freely associate** in all their facilities. Supplier will work constructively with their employees, or any organization that represents employees, to promote employees best interests. Suppliers will seek to provide opportunities for employees' concerns to be heard. Suppliers collectively bargain where law/welfare systems require them to do so.
4. Suppliers will not tolerate **harassment and/or discrimination** on the basis of sex, race, color, religion, creed, age, ethnic origin, national origin, marital / parental status, pregnancy, disability, sexual orientation or any other personal condition, and they will recognize and promote the positive value of diversity.
5. Suppliers will provide and maintain for all employees a **safe and healthy working environment** that meets or exceeds applicable regulations for occupational safety and health.
6. Suppliers will comply with applicable law regulating **hours of work**.
7. Suppliers will provide **compensation and benefits** complying with applicable law in order to promote as much as possible their employees' material well-being.
8. Suppliers will fully consider **local population and communities** among their primary stakeholders in all projects they plan to carry out. Suppliers will openly share their plans with all recognized members of their stakeholders.

## ETHICS

1. With reference to Brembo **Anti-bribery** Code of Conduct, suppliers must act transparently and with integrity in compliance with applicable anti-corruption laws in all countries in which they conduct business. Any form of corruption, criminal solicitation, extortion and embezzlement is strictly forbidden. Suppliers will not offer, promise, pay, claim, directly or indirectly, money (through bribes and/or facilitations payments included) or other benefits in order to obtain an undue advantage, either in cases where the undue advantage is offered directly or through intermediary.
2. **Fair competition** is a fundamental prerequisite for generating success through good performance and creating value for shareholders. Suppliers must operate in compliance with the **competition, antitrust and**



**trade** rules applicable in each country where they operate. Agreements which impair fair competition, are strictly prohibited such as business practices which may represent an Antitrust Laws violation.

3. Suppliers must report any significant, real or potential **conflict of interest** in the conduct of their business. A conflict of interests exists when a personal interest or activity interferes or appears to interfere with the business relationship with Brembo.

4. Suppliers must strongly oppose to all forms of money **laundering** and take measures to ensure that each economic and financial operation is traced. This allow the identification of the origin of the goods and/or the money of each business operation and thus prevent its financial transactions from being used by third parties to launder money.

5. Suppliers must comply with the **intellectual property rights of third parties** and protect the information and personal data of their customers.

6. The adoption of a **Code of Conduct** and a periodic review of its application are strongly recommended.

## **ENVIRONMENTAL PROTECTION**

To minimize the **impact of production activities of Brembo production chain and its products on the environment**, all Suppliers should:

1. make every effort to optimise the use of natural resources, to reduce the emissions polluting the environment and the emissions of gases responsible for the "greenhouse effect".
2. design, use and/or suggest products and processes that take into account environmental impacts.
3. properly manage, in compliance with applicable laws, waste treatment and disposal;
4. avoid the use of forbidden substances (i.e. CMR, Cancerogenic Mutagens and Reproductive Toxic) and adequately manage potentially hazardous substances (as defined by applicable laws).
5. adopt optimized logistics procedures that minimize environmental impacts.



## CONFLICT MINERALS

All suppliers must declare to Brembo the presence and origin of materials regulated by the 3TG Conflict Minerals Standard such as Gold, Coltan, Cassiterite, Wolframite and their derivatives such as Tantalum, Tin and Tungsten if contained in the products being supplied. To this end, Suppliers must conduct a systematic investigation of their supply chain in accordance with the OECD Guidelines ([www.oecd.org](http://www.oecd.org)) specifying what is required in terms of "due diligence" on the subject.

## TRAINING

Brembo encourages all Suppliers to disseminate the principles outlined above, also through adequate training of employees of their supplier base.

## REPORTING VIOLATIONS

Suppliers should report to Brembo any violation by employees of Brembo and/or their employees of the Code of Ethics, the Anti-bribery Code of Conduct, the Organization Management and Control Model and, more generally, the Brembo Internal Control System through the following e-mail: [Organismo\\_Vigilanza@brembo.it](mailto:Organismo_Vigilanza@brembo.it). Brembo guarantees the confidentiality of the identity of the reporting person in good faith and / or refuses to carry out or undertake actions that violate the Suppliers Code of Conduct.

Suppliers also undertake to maintain the documentation and / or information required to substantiate the above mentioned report.

Brembo reserves the right to verify such documentation as it deems necessary.

## MONITORING AND CORRECTIVE ACTIONS

The Brembo Group reserves the right to carry out audits conducted by Brembo Staff and/or a third party upon proper notice on the matters covered by this Code of Conduct.

In case of non-compliance, Brembo:

- will require suppliers to prepare and implement a non-compliance recovery plan;
- will conduct documentary audits and/or additional audits to ascertain the actual implementation of the above recovery plans, subject to appropriate prior notice.

In the event that the Supplier violates the Suppliers Code of Conduct, or in the event of non-compliance and the anticipated improvement plans are not being prepared and carried out, Brembo reserves the right to suspend and/or resolve in advance with immediate effect any commercial relationship and to act for the compensation of any loss, damage, expense or other costs incurred which may result from any breach and/or conduct by the Supplier.



Below are some useful links for taking the Brembo Codes of Conduct and Corporate Social Responsibility Brembo outlined in this document:

- <http://www.brembo.com/en/company/corporate-governance/codes-policies>
- <http://www.brembo.com/en/sustainability/corporate-social-responsibility>

## **SUPPLIER'S COMMITMENT**

Brembo requires that all Suppliers who receive the above-mentioned Suppliers Code of Conduct return this "Commitment Form" signed by a legal representative.