

SUSTAINABILITY POLICY
FOR SUPPLIERS





FOREWORD

Sustainability plays a crucial role in the long-term strategic success not only of Tratter Engineering Srl but also of its suppliers. The new sustainability policy for suppliers of Tratter Engineering Srl actively promotes sustainable business practices while forming the basis for economic, environmental, and social responsibility. This document summarizes the fundamental principles and standards of Tratter Engineering Srl for its suppliers of production-related and non-production-related goods and services, adhering to globally recognized guidelines and principles.



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1 TREATMENT OF EMPLOYEES

Tratter Engineering Srl places great importance on ensuring that its suppliers respect fundamental labor rights in accordance with the applicable national legislation. Additionally, we expect our suppliers to recognize the core labor standards of the International Labour Organization (ILO), taking into consideration local laws and regulations in different countries and locations.

1.1 CHILD LABOR

We strictly prohibit all forms of child labor in accordance with ILO conventions and forbid our suppliers from exploiting children. Support for child labor and the exploitation of children are also strictly prohibited. The minimum age for employment must be at least 15 years, unless higher minimum age is required by legal regulations.

1.2 HUMAN RIGHTS

It is essential for us that our suppliers respect and support internationally recognized human rights. We expect them not to be involved in any human rights violations.

1.3 FORCED LABOR AND HUMAN TRAFFICKING

Our suppliers must refrain from any form of forced or compulsory labor, including involuntary prison labor. Any involvement in human trafficking, the use of violence, or the use of involuntary or slave labor is strictly prohibited.

1.4 DISCRIMINATION AND EQUAL OPPORTUNITIES

Tratter Engineering Srl demands that its suppliers promote equal opportunities and equal treatment. Discrimination in the hiring of employees, promotions, or the provision of training and development opportunities must not occur. Our suppliers must ensure that no employee is discriminated against or favored based on their race, gender, disability, worldview, culture, sexual orientation, age, religion, ethnic or social origin, nationality, physical appearance, marital status, or political or trade union activities. Furthermore, they should actively support gender equality and respect and protect the rights and interests of indigenous populations and local communities in accordance with international standards.

1.5 OCCUPATIONAL HEALTH AND SAFETY

Compliance with the relevant national legislation on occupational health and safety is mandatory for our suppliers. Regardless of whether international standards set lower requirements, suppliers must ensure compliance with all safety regulations.

1.6 REMUNERATION AND WORKING HOURS

Our suppliers must provide remuneration and benefits in accordance with the fundamental principles of minimum wages, overtime, and legally required social benefits. Working hours should be established in accordance with applicable laws, industry norms, or relevant ILO conventions.

1.7 FREEDOM OF ASSEMBLY AND COLLECTIVE BARGAINING

We expect our suppliers to respect the rights of employees in accordance with national legislation, allowing them to form employee representations and engage in collective bargaining.

1.8 WHISTLEBLOWING

The corporate ethics of our suppliers must include provisions for whistleblowing and protection against retaliation, in line with Article 19 of the World Bank's Whistleblower Retaliation Policy (WBRL). Instances of non-compliance must be thoroughly investigated.

2 BUSINESS CONDUCT

2.1 PRODUCT SAFETY

Our suppliers are required to ensure that their products and services do not pose any risk to human beings or the environment. Compliance with agreed-upon or legally mandated standards for product safety is of utmost importance. Suppliers are also encouraged to provide clear instructions for the safe use of their products.

2.2 CORRUPTION AND BRIBERY

Tratter Engineering Srl expects its suppliers to demonstrate a clear commitment to zero tolerance for corruption. Compliance with the United Nations (UN) and Organization for Economic Co-operation and Development (OECD) conventions on combating corruption, as well as all relevant anti-corruption laws, is mandatory. It is expressly forbidden for employees, subcontractors, or representatives to offer, promise, or grant advantages to Tratter Engineering Srl employees or related third parties in order to gain business contracts or other benefits.

2.3 FAIR COMPETITION

Tratter Engineering Srl does not tolerate any actions, agreements, or arrangements that restrict competition in any way. Our suppliers must not engage in anticompetitive practices with competitors or abuse any potentially dominant market position. Furthermore, we require our suppliers to actively prevent the inclusion of plagiarized parts in the supply chain. If plagiarism is discovered, all necessary steps must be taken immediately to prevent damages, and Tratter Engineering Srl must be notified.

2.4 MONEY LAUNDERING

Our suppliers must adhere to the relevant legal provisions for the prevention of money laundering and must not engage in any money laundering activities.

2.5 AVOIDANCE OF CONFLICTS OF INTEREST

Suppliers to Tratter Engineering Srl are expected to base their decisions related to their business dealings with our company solely on objective criteria. They must avoid conflicts of interest where secondary personal or institutional interests could jeopardize primary business interests.

2.6 PROTECTION OF INTELLECTUAL PROPERTY AND INFORMATION DISCLOSURE

We expect our suppliers to carefully safeguard confidential data, information, inventions, know-how, and intellectual property and to use them only for business purposes. A concluded confidentiality agreement between both parties forms the basis for our business relationships.

2.7 FINANCIAL RESPONSIBILITY

Tratter Engineering Srl places great importance on the prudent use of financial resources within the company to significantly reduce financial risk for customers and suppliers. The documentation of financial information is carried out diligently, and the traceability of financial flows is ensured to the best possible extent. Employees who come into contact with the company's bookkeeping or other financial and tax-relevant documentation as part of their job are obligated to exercise due diligence within the legal framework.

2.8 EXPORT CONTROLS AND ECONOMIC SANCTIONS

Our suppliers must adhere to all export control regulations and economic sanctions in accordance with international laws and regulations. We expect them to act responsibly and uphold the highest ethical standards.

3 ENVIRONMENTAL PROTECTION

3.1 RESOURCE MANAGEMENT AND SUSTAINABLE ECONOMIC BENEFIT

Tratter Engineering Srl is committed to a responsible use of resources and strives for sustainable economic benefit in all its business activities. By incorporating new technologies, considering material cycles, and leveraging expertise, we aim to minimize the consumption of raw materials. Special attention is given to the efficient use of energy and water. Additionally, we continuously work on concepts to reduce water consumption and improve water quality. Whenever possible, we prioritize the utilization of renewable resources.

3.2 AVOIDANCE AND MITIGATION OF ENVIRONMENTAL IMPACT, WASTE REDUCTION, GREENHOUSE GAS, AND NOISE EMISSIONS, USE OF RECYCLING MATERIALS

Tratter Engineering Srl seeks to minimize emissions to the extent possible, following the current state of technology. We control and treat harmful emissions before releasing them into the environment. Our efforts are directed towards avoiding or recycling waste materials whenever feasible. We promote the reuse of materials when viable and explore the use of recycling materials. Furthermore, we develop processes that regulate the transportation, storage, safe treatment, and environmentally friendly disposal of waste. General air and noise emissions from our operations, as well as greenhouse gas emissions, are characterized, routinely monitored, reviewed, and treated as needed. We strive to monitor our exhaust gas cleaning systems and find cost-effective solutions to minimize all emissions.

3.3 SUSTAINABLE RESOURCE AND HABITAT MANAGEMENT: OUR RESPONSIBILITY IN ACTION

We place special emphasis on the sustainable management of water. Our suppliers are required to ensure that their activities do not compromise water quality and that water resources are used efficiently. We encourage them to minimize water-intensive processes and promote creative solutions for responsible water use.

The protection of animals, preservation of biodiversity, sustainable land management, and prevention of deforestation are cornerstones of our mission. We ask our suppliers to shape and support their activities

in harmony with these principles.

Preserving soil quality holds a prominent position in our sustainability policy. We expect our suppliers to implement targeted measures to preserve and promote soil health, making a significant contribution to long-term sustainability.

3.4 AVOIDANCE OF HAZARDOUS SUBSTANCES

Tratter Engineering Srl avoids the use of substances that could pose a risk to human beings and the environment whenever possible. We have implemented a hazardous substance management system to ensure the safe use, transportation, storage, reprocessing, reuse, and disposal of hazardous substances.

3.5 ENVIRONMENTALLY FRIENDLY PRODUCTS - ENHANCED FOCUS ON ENERGY EFFICIENCY AND USE OF RENEWABLE ENERGY

In the development of products and services, Tratter Engineering Srl places significant emphasis on their efficient use of energy and natural resources. Our products are designed to be suitable for reuse, recycling, or safe disposal. We prioritize energy efficiency and increased use of renewable energy sources in line with our environmental goals. We aim to reduce the CO² footprint throughout the entire supply chain and explore the potential use of recycled materials.

4 CONFLICT-FREE ORIGIN OF MINERALS

Tratter Engineering Srl is aware of the potential link between the production of raw materials and armed conflicts or gross human rights violations. If minerals are sourced from conflict-affected regions or high-risk areas, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas must be followed.

Conflict minerals currently include columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives, limited to tantalum, tin, and tungsten. Deliveries to Tratter Engineering Srl must be considered „DRC conflict-free“ in accordance with SEC regulations.

5 MANAGEMENT SYSTEMS

Tratter Engineering Srl implements management systems that ensure compliance with the principles outlined here and certifies them according to recognized standards. We prefer suppliers who actively operate a quality management system in accordance

with ISO 9001, an energy management system according to ISO 50001, an environmental management system according to ISO 14001, and ISO 45001 for occupational health and safety, or equivalent systems.

6 PROTECTION OF IDENTITY AND PROTECTION FROM PERSECUTION, DATA PRIVACY

Tratter Engineering Srl expects its suppliers to protect employees who submit a complaint report within the supplier's organization from threats, harassment, or any other adverse actions. Additionally, the protection of personal data of the reporting and reported individuals must be ensured. Whistleblowers' identities are to be kept confidential during all stages of the process by the supplier company.

Confidentiality / Data Privacy:

The supplier commits to meet the reasonable expectations of its clients, suppliers, customers, consumers, and employees regarding the protection of private information. The supplier must comply with data protection and information security laws and regulatory requirements concerning the collection, storage, processing, transmission, and disclosure of personal information.



7 SUPPLIER RELATIONSHIPS

7.1 SUB-SUPPLIERS

Tratter Engineering Srl expects its suppliers to communicate all the principles and requirements described here to their sub-contractors, suppliers, and service providers and enforce their compliance. When selecting suppliers/service providers, the standards regarding human rights, working conditions, corruption prevention, and environmental protection should also be taken into account. Suppliers are encouraged to ensure that their sub-contractors and suppliers adhere to the described standards.

7.2 MONITORING AND ACCOUNTABILITY

Upon request, the supplier must provide Tratter Engineering Srl with all necessary information for an initial assessment, accurately and comprehensively, as part of a self-assessment. Furthermore, the supplier shall provide any other information that proves compliance with this policy. Tratter Engineering Srl will monitor the implementation of this policy. The supplier is required to inform Tratter Engineering Srl about any events that contradict the principles of this policy.

7.3 SUPPLIER'S DECLARATION

The supplier hereby confirms:

We have received the Sustainability Agreement of Tratter Engineering Srl and commit to comply with the principles and requirements of this Sustainability Agreement in addition to our obligations under the framework agreement with Tratter Engineering Srl. We agree that this declaration is governed by substantive law, excluding norms that refer to other legal jurisdictions.

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<i>Date</i>	<i>Company name</i>	<i>Signature</i>

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