

	PURCHASE/ SUSTAINABILITY	Numero: 01 Revisione: Edizione: 07/08/2026
CODE OF CONDUCT FOR SUPPLIERS		Pagina: 1 di 4

CODE OF CONDUCT

ZUEGG is committed to conducting its business in an ethical, responsible, and sustainable manner—economically, socially, and environmentally. We expect all our suppliers, contractors, consultants, and business partners to share these same principles and apply them throughout the entire supply chain.

Suppliers are required to be familiar with, accept, and comply with this Code of Conduct and to ensure that their employees, associates, subcontractors, and sub-suppliers operate in accordance with the principles defined herein.

1. COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers must comply with all applicable local, national, and international laws, regulations, and standards, including those relating to labor, the environment, health and safety, competition, anti-corruption, data protection, and human rights.

2. HUMAN RIGHTS AND LABOR PRACTICES

Child labor

Suppliers must not employ child labor and must adhere to the minimum age requirements set forth by applicable laws and International Labour Organization (ILO) conventions.

Forced labor

Any form of forced, compulsory, or bonded labor, slavery, human trafficking, or other forms of exploitation is prohibited.

Equal treatment and non-discrimination

Suppliers guarantee equal opportunities and fair treatment for all workers, without discrimination based on gender, age, ethnic origin, nationality, religion, sexual orientation, gender identity, disability, political opinion, or any other characteristic protected by law.

Harassment and respect for the individual

The supplier must ensure a work environment free from harassment, intimidation, abuse, violence, or degrading behavior.

	Redatto	Verificato	Approvato
Data:			
Firma:			
Funzione:			

	ACQUISTI/ SOSTENIBILITA'	Numero: 01 Revisione: Edizione: 07/08/2026
Titolo: Codice di Condotta per fornitori		Pagina: 2 di 4

Remuneration and working hours

The supplier must ensure wages, benefits, and working conditions that comply with applicable regulations, as well as appropriate working hours and rest periods.

Freedom of association

The supplier respects the workers' right to join or not join trade unions and to participate in collective bargaining, in compliance with applicable laws.

Occupational health and safety

The supplier must ensure a safe and healthy work environment by adopting preventive measures to reduce risks, providing adequate training, and ensuring compliance with health and safety regulations.

3. ENVIRONMENTAL RESPONSIBILITY

The supplier commits to operating in an environmentally responsible manner and to complying with all applicable environmental regulations.

In particular, the supplier commits to:

- * using energy, water, and raw materials efficiently;
- * reducing waste generation and promoting material recovery and recycling;
- * preventing and minimizing environmental pollution;
- * monitoring and, where possible, reducing greenhouse gas emissions;
- * promoting the protection of biodiversity and natural resources;
- * adopting sustainable practices throughout the entire production cycle.

4. BUSINESS ETHICS AND INTEGRITY

Integrity

The Supplier conducts its business activities with fairness, transparency, and professionalism.

Anti-corruption

Any form of corruption, bribery, extortion, illicit payment, or other practice aimed at obtaining undue advantages is prohibited.

Conflicts of interest

The Supplier must avoid situations that may give rise to actual or potential conflicts of interest and must promptly disclose them to ZUEGG.

	ACQUISTI/ SOSTENIBILITA'	Numero: 01 Revisione: Edizione: 07/08/2026
Titolo: Codice di Condotta per fornitori		Pagina: 3 di 4

Fair competition

The Supplier operates in compliance with competition and free-market regulations, avoiding anti-competitive or unfair practices.

Fraud and money laundering prevention

The Supplier adopts appropriate measures to prevent fraud, money laundering, and other illicit activities.

5. QUALITY AND SAFETY OF PRODUCTS AND SERVICES

The Supplier commits to providing products and services that comply with contractual requirements, applicable quality standards, and current regulations.

For food products, the Supplier guarantees compliance with regulations regarding food safety, hygiene, traceability, quality, and sustainability.

6. CONFIDENTIALITY, DATA PROTECTION, AND INFORMATION SECURITY

The Supplier must protect confidential information received from ZUEGG and respect intellectual property rights.

The Supplier also commits to:

- * complying with applicable personal data protection regulations;
- * adopting appropriate cybersecurity measures to protect data, systems, and information;
- * promptly reporting any data breaches or security incidents that may impact ZUEGG.

7. REPORTING VIOLATIONS

Suppliers promote the prevention and investigation of any conduct that is unlawful and/or contrary to this Code of Conduct, encouraging their employees to promptly report any incidents of which they become aware. Zuegg provides the email address segnalazioni.verona@zuegg.it for anyone wishing to submit a report, guaranteeing confidentiality throughout the report-handling process. Reports may also be submitted in a sealed envelope addressed to: Whistleblowing Body c/o ZUEGG S.p.A., Via Francia no. 6 – Verona – Italy, marked “Confidential – For the attention of the report handler – Whistleblowing Body.” The handling of the report and the verification of the reported circumstances are entrusted to the Supervisory Body; this body acts in accordance with principles of impartiality and confidentiality, carrying out any activities deemed appropriate to resolve any conflicts or reported rights violations.

	ACQUISTI/ SOSTENIBILITA'	Numero: 01 Revisione: Edizione: 07/08/2026
Titolo: Codice di Condotta per fornitori		Pagina: 4 di 4

8. RESPONSIBLE SUPPLY CHAIN

The supplier is required to promote and monitor adherence to the principles of this Code among its sub-suppliers, subcontractors, and business partners.

Upon ZUEGG's request, the supplier shall provide reasonable information regarding the measures taken to ensure compliance within its supply chain.

9. COMPLIANCE VERIFICATION

ZUEGG reserves the right to request documentary evidence or conduct reasonable checks regarding compliance with this Code.

Failure to observe the fundamental principles of this Code may result in a requirement for corrective actions and, in the most serious or persistent cases, the suspension or termination of the business relationship.

10. ACCEPTANCE OF THE CODE

By declaring that it has read, understood, and accepted this Code of Conduct, the supplier commits to upholding its principles and promoting them within its organization and its supply chain.