



Bulltek Supplier Code of Conduct

Version 1.0 Date: 15.04.2019





Bulltek OOD expects its suppliers to support its efforts by observing basic ethical principles and statutory provisions and by their responsible approach to their production processes. It is in this context that Bulltek has developed this Supplier Code of Conduct and requires its suppliers to comply with it.

1. General Principles, Laws and Statutes

The supplier commits to upholding its social responsibility in all business dealings. In all its business activities and decisions, the supplier shall respect the laws in effect and any other applicable provisions in the countries where it is active.

2. Prohibition of Corruption and Bribery

The supplier assures not to practice or tolerate any form of corruption, extortion or embezzlement. Unethical behavior may not be used to unlawfully influence others in business dealings by exchanging gifts or offering or granting other benefits either at home or abroad. The same applies to the unlawful acceptance of benefits.

3. Human Rights / Child Labour / Forced Labour / Working Conditions / Discrimination

The supplier respects and supports compliance with the internationally recognized human rights and ensures not to participate in human rights violations.

Child labour as defined by the International Labour Organization as well as national provisions is



prohibited and any form of exploitation of children and adolescents will not be tolerated. The supplier assures that the production and / or processing of the supplied goods is being carried out without exploitative child labour defined in the International Labour Organization conventions.

Any form of forced or compulsory labour including involuntary prison labour will be refrained from by the supplier.

Working hours are set according to the current laws, the industry standards or the applicable International Labour Organization conventions. Overtime shall be voluntary and employees are entitled to at least one day off after six consecutive working days. Compensation and social benefits have to be granted in accordance with the basic principles of minimum wages, overtime and the statutory social security systems / social welfare systems.

As a supplier to Bulltek, you shall:

- Respect the personal dignity, privacy and rights of each individual;
- Refuse to make any person work against his or her will; and
- Prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

4. Health, Safety and Environmental Protection

In order to act in harmony with the environment and to avoid hazards to humans and the environment, the supplier observes all applicable health, employment and environmental-related laws and other specifications.



As a supplier to Bulltek, you shall provide a safe and healthy workplace for all of your employees and shall conduct your business in an environmentally sustainable way. In particular, you will

- Formally appoint a competent person to manage health, safety and environmental programs and improvements;
- Establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks; and
- Ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

5. Prohibited substances and materials

All the supplies, products or parts bought from the supplier by Bulltek, must not contain any product, material or substance prohibited by the legislations or regulations applicable in the supplier's country, the European Union and, more generally, in all of the countries in which these supplies, products or parts are marketed and used. If applicable to the goods delivered to Bulltek the supplier also complies with its obligations concerning the area of "Conflict Minerals".

Therefore, suppliers shall ensure that the goods provided to Bulltek are in compliance with requirements covered under the scope of all relevant regulations. In particular, you will:

- Implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals;
- Respond in a timely manner to Bulltek's requests for evidence of your compliance with these



requirements;

- The Supplier products purchased from BULLTEK in Europe are compliant with EC Regulation 1907/2006 (REACH).

REACH compliant means that all relevant substances are:

- excluded from the regulation, and/or
- exempted from registration, and/or
- have been pre-registered and/or have been registered;
- The Supplier products do not contain any substances mentioned in EU Directive 2011/65/EU for the restriction of the use of certain hazardous substances in electrical, electronic equipment (RoHS) - amended by EU Directive 2015/863/EU - replacing Directive 2002/95/EU.

6. Adherence to Antitrust law

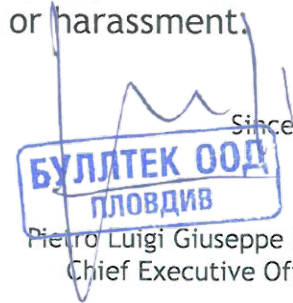
The supplier will conduct its business in compliance with the principles of fair competition and in accordance with all applicable antitrust laws.

7. Freedom of Association

The supplier respects the rights of employees to associate freely, join or not join trade unions, seek



representation and join workers' councils. Employees should be able to communicate openly with the Management regarding working conditions without threat of reprisal, intimidation or harassment.

Sincerely,

Pietro Luigi Giuseppe Ghia
Chief Executive Officer

Confirmation of the Bulltek Supplier Code of Conduct

We acknowledge receipt of the BULLTEK Supplier Code of Conduct and confirm the compliance with the contents for all deliveries and services for BULLTEK. We undertake to require our own suppliers to comply with the provisions pursuant to this Code of Conduct. We are perfectly aware that BULLTEK will consider any major infringement of the above obligations by us as a breach of contract and that BULLTEK will reserve the right to take appropriate measures.

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Date

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Names/ Position

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Company

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Signature / Stamp