

SUPPLIER CODE OF CONDUCT

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Contact

+39 0331 756111



Website

www.secondomona.com



E-mail

sostenibilita@secondomona.com

SUPPLIER CODE OF CONDUCT

For more than 120 years, Secondo Mona has been engaged in the design and manufacture of onboard systems and equipment for both civil and military aircraft, encompassing fixed and rotary wing models. Our products are integrated into all Italian aeronautical programs as well as the principal European multinational programs established after World War II.

Secondo Mona asserts that we recognize the global challenges we face and aim to take a leading role in addressing them by upholding progressively higher standards of integrity, fairness, reliability, and sustainability.

Secondo Mona asserts that the principles of equal opportunity, inclusion, and respect for all individuals, along with adherence to both internal and external regulations and the company's Code of Ethics, are vital to the organization's success and sustainability.

Suppliers play a crucial role in the execution of the company's strategy. It is imperative that they uphold the same values, principles, and standards.

Secondo Mona mandates that all suppliers adhere to responsible business practices aimed at sustainable development. All operations must be carried out in accordance with this Code of Conduct.





LEGAL PROVISIONS

Suppliers, in addition to adhering to the laws of their own country, must also comply with all applicable laws in the countries of the recipients of the goods and/or services provided, including those specifically related to the business conducted.

HUMAN RIGHTS

Suppliers must avoid any form of relationship, whether directly or indirectly, or through a third party, with individuals or legal entities that support, or have reasonable grounds to believe support, criminal organizations of any kind, both in Italy and abroad. This includes those involved in human trafficking, the exploitation of child labor, and forced, indentured, or compulsory labor.

EMPLOYEES

Suppliers are required to foster a diverse and inclusive work environment that ensures respect for personal dignity and equitable treatment for all individuals engaging with the Company in any capacity, irrespective of race, religion, gender, age, ethnic or national origin, disability, sexual orientation or preference, marital status, citizenship, political affiliation, or other personal attributes; in essence, an environment where individual characteristics do not lead to discrimination or bias.

They are required to furnish their employees with a workplace devoid of physical, psychological, sexual, and verbal harassment, intimidation, or any other unlawful behavior.





BUSINESS ETHICS

According to Mona, it has developed, upholds, and regularly assesses the Anti-Corruption Policy.

Suppliers are required to adhere to anti-corruption laws, directives, and regulations that govern operations in the countries where they conduct business, irrespective of local customs.

Suppliers are required to conduct thorough due diligence to assess the reputation and reliability of the entities with which they plan to form relationships for the purpose of producing goods or delivering services directly to Secondo Mona.

Suppliers are specifically prohibited from:

- Offering or bestowing benefits of any nature to representatives of Public Administration, political parties, candidates for public office, or representatives of private companies or entities to sway their decisions in any manner;
- Offering or disbursing monetary payments to representatives of Public Administration, political parties, candidates for public office, or representatives of private companies or entities to sway their decisions in any manner;
- Receiving or providing gifts or gratuities that surpass customary commercial practices and courtesies.

Mona asserts that suppliers must refrain from any situations that may present a conflict of interest, including potential ones.

ENVIRONMENTAL HEALTH AND SAFETY

Mona asserts that suppliers should advance their businesses with the objective of consistently prioritizing sustainability through the implementation of a suitable environmental management system.

Particular attention is necessary when utilizing hazardous chemicals, products, and materials, which must comply with relevant laws and regulations.

INFORMATION

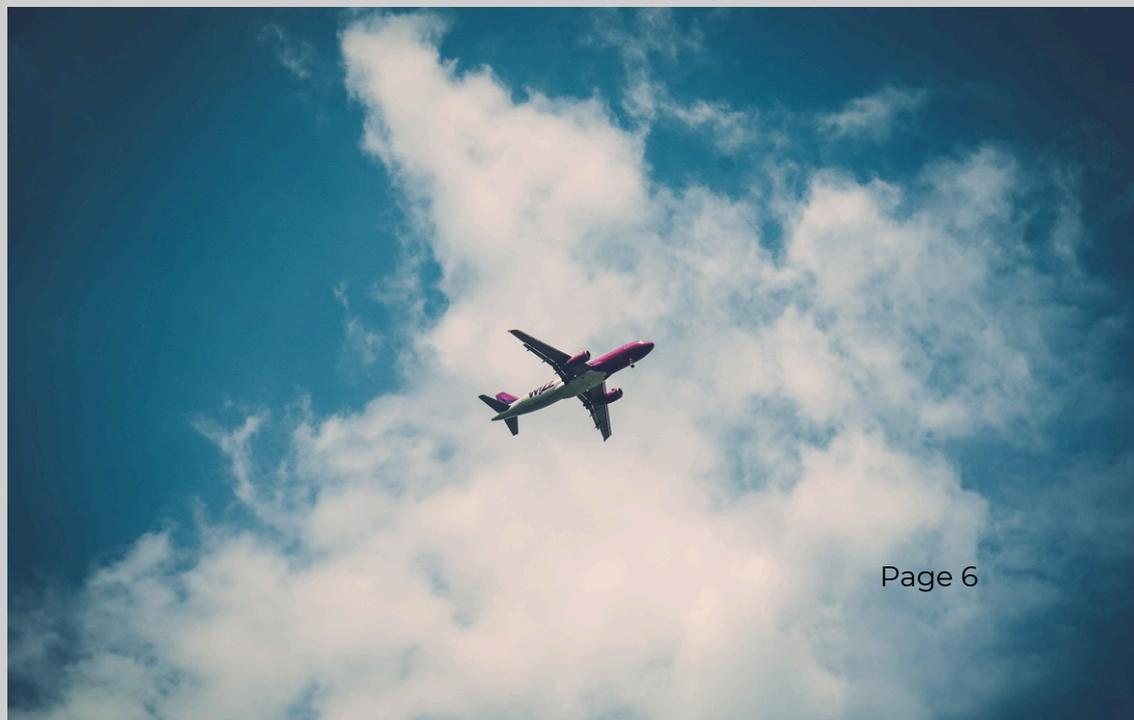
Suppliers are required to ensure the secure management of information obtained from Secondo Mona, safeguarding it against unauthorized access, destruction, use, modification, and disclosure.

To achieve this objective, they must implement appropriate cybersecurity programs.

The information shall be utilized solely for the purpose for which it was intended.

Additionally, suppliers must adhere to privacy laws and regulations concerning the collection, processing, and transfer of personal data and information.

- Any data breach or security incident, regardless of whether it is merely suspected, must be reported to the following email address: cybersecurity@secondomona.com.
- Suppliers are required to adhere to all relevant intellectual property rights legislation, including provisions for disclosure protection.



IMPORT AND EXPORT REGULATION

- Suppliers must guarantee that their business practices adhere to all relevant laws, directives, and regulations pertaining to the import and export of components, technical data, and services.
- Suppliers are required to adhere to relevant laws and regulations concerning the direct and indirect procurement of critical materials and conflict minerals, including tin, tantalum, tungsten, and gold.

COUNTERFEITING, SAFETY, AND QUALITY OF COMPONENTS/PRODUCTS

Mona anticipates that suppliers will establish, execute, and uphold suitable methods and processes for their products to mitigate the risk of providing counterfeit parts and materials.

The Company anticipates that suppliers will adhere to all laws and regulations pertaining to product safety and quality, in alignment with legally mandated and mutually agreed standards.

To this end, they must establish a system to detect any counterfeit components and/or materials and/or any defects.





CONTRIBUTION CONSISTENCY

Suppliers are required to adhere to all applicable tax, labor, and social security regulations. Under no circumstances should suppliers intentionally participate in tax and/or social security evasion or assist others in such evasion. They must establish robust controls to mitigate the risk of evasion.

PAYMENT PROCEDURES

Mona anticipates that suppliers will implement fair and reasonable payment practices, ensuring the timely settlement of valid, undisputed invoices in alignment with the agreed contractual payment terms and relevant regulations.

BREACH OF THIS CODE OF CONDUCT

Should the stipulations of this Code be violated, the business relationship may be reassessed, and remedial measures may be undertaken in accordance with the terms of the procurement contract(s), potentially culminating in removal from the supplier register.

REPORTING OF MISCONDUCT (WHISTLEBLOWING)

Any individual who becomes aware of behaviors (acts or omissions) that raise reasonable doubt or knowledge of being unlawful or in violation of the Code of Ethics, the Model, internal company regulations, or applicable compliance procedures and/or standards in accordance with Legislative Decree no. 231/2001 is obligated to report them.

Reports may be submitted:

- in writing via standard mail to the address

Dr. Cinzia Petroni

c/o Secondo Mona S.p.A.

Via Carlo del Prete, No. 1

21019 – Somma Lombardo (VA)

In this instance, the report must be enclosed in two sealed envelopes. The first envelope should include the identification information of the reporting individual, accompanied by an identity document, while the second envelope must contain the subject of the report. Both envelopes are to be placed within a third envelope labeled "reserved for the individual responsible for managing the report" on the exterior.

- orally, through the dedicated telephone line number 3499881993, available 24/7, exclusively for the Whistleblowing Manager's use.

The comprehensive whistleblowing policy can be accessed on the company website: www.secondomona.com

