

# Supplier Code of Conduct



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# 1. CODE OF CONDUCT FOR SUPPLIERS OF TARGA TELEMATICS

This Supplier Code of Conduct defines the principles with which all suppliers working with Targa Telematics and all its subsidiaries, must comply, in adhering to the company's approach to sustainable development.

Targa Telematics regards any form of discrimination, corruption, exploitation of child or forced labor as prohibited and works to promote the dignity, health, freedom and equality of workers, inspired by the Universal Declaration of the United Nations, the Fundamental Conventions of the International Labor Organization, and the OECD Guidelines.

The selection of Suppliers is based on these values, as well as on quality and price indicators.

By signing the Code of Conduct for Suppliers of Targa Telematics, the Supplier accepts the terms of this Code unconditionally and undertakes to ensure compliance with the principles set therein. The Code of Conduct is included in the General Terms and Conditions of Purchase. Once signed, it forms an integral part of the contractual purchase documents signed by Targa Telematics and the relevant Supplier.

The Supplier shall comply with the local laws or regulations, in the event that these require more restrictive conditions than this Code of Conduct for the activities carried out.



## 2. TARGA TELEMATICS

### 2.1. The principles governing Targa Telematics' activities

Corporate social responsibility and the pursuit of sustainability are essential elements to the way that Targa Telematics conducts business. The company has always paid great attention to the ethical aspects of business and regards legality and fairness as core requirements within its business activities.

Targa Telematics subjects its daily conduct to the principles of **transparency, good faith, loyal cooperation, honesty, fairness, impartiality** and

absolute **respect for the laws** and regulations in effect in Italy and in the countries in which it operates, in order to satisfy its clients to the greatest possible extent, to enhance the value of the company, to support the continuous development of its human and professional capital, and to compete effectively in its target markets.

Find below the **fundamental principles** on which Targa Telematics' activities are based.

#### Sustainability

The Company's activities are inspired by the principle of safeguarding the environment and public health, in compliance with the specific applicable regulations.

#### Social Responsibility

The Company strives to create an environment in which cooperation is encouraged, with a very strong involvement of people and where creativity is stimulated through listening.

#### Legality and Fairness

The Company ensures and promotes respect for laws, standards and rules, internally and in all communities in which it operates. It also ensures that its functionality, reputation, image and decorum are protected and safeguarded.

#### Reliability

The Company operates in a way that justifies and safeguards its trust, pursuing the client's interest with loyalty and diligence in the performance of assignments, preventing and thwarting conflicts of interest.

#### Collaboration

The Society cooperates with universities, research centers and associations to develop and circulate the knowledge and technological and cultural innovations within the professional community that enable the overall improvement of quality and social utility.

#### Transparency, Impartiality and Honesty

The Company orients its actions according to conduct marked by ethics and transparency, based on integrity, fairness, loyalty, equity, impartiality, independence and autonomy of judgment, clarity of positions taken and decision-making and implementation mechanisms adopted.

#### Quality

In carrying out its activities, the Company is careful to ensure that the general conditions for freedom of enterprise are met by favoring and pursuing improvements in the quality of services.

## 2.2 The principles governing the relationship between Targa Telematics and its Suppliers

Relations with Suppliers are conducted with respect for **environmental and data protection and privacy**, ensuring **security and transparency**.

Targa Telematics aims for maximum satisfaction of its clients and consistently guarantees high levels of service.

### Health and safety

protecting its own health and safety and that of third parties, minimizing accidents, injuries and occupational diseases.

### Protection of data and privacy

maintaining absolute confidentiality of information and know-how concerning the company, using data only for legitimate, defined purposes, appropriate to the conduct of its business.

### Protection of the environment

minimizing the potentially harmful effects of its own activities and those of third parties on the environment, safeguarding natural resources.

### Impartiality and transparency

avoiding or declaring any conflicts of interest with Targa Telematics in advance, starting from the negotiation stage.





## 3. COMMITMENT OF OUR SUPPLIERS

### 3.1. Environmental Dimension

Each Supplier is committed to managing its activities in a way that minimizes impact on the ecosystem and seeks a balance between economic initiatives and environmental protection. Particular importance is attributed to the following areas.

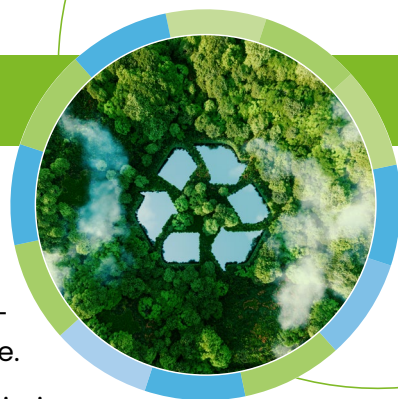
**Energy:** the Supplier is committed to maximizing energy conservation, giving priority to the use of energy from renewable resources.

**Hazardous Substances:** the Supplier avoids illegal discharges or emissions and ensures that wastes and processing residues considered to be higher risk are treated in accordance with the specific legal requirements and regulations in effect.

**Waste:** the Supplier shall undertake to minimize the amount of waste generated and maximize the recycling of waste.

**Water:** the Supplier maximizes water conservation and avoids releasing wastewater into the natural environment before it has treated this wastewater or has arranged for its processing in licensed treatment facilities.

**Respect for local communities:** the Supplier undertakes to monitor, control and address the impacts produced by its activities on the territory in which it operates in an appropriate manner.



### 3.2. Human Dimension

Each Supplier agrees to manage its activities according to the principles of social responsibility in doing business.

**Prohibition of forced and child labor:** the Supplier agrees not to use any form of forced, illegal, or compulsory labor, slavery, or human trafficking (as outlined in the Modern Slavery Act). The Supplier agrees to employ only workers who are not younger than the minimum age established by local regulations or the age for completion of mandatory schooling.

**Prohibition of Discrimination and Exploitation:** the Supplier guarantees promotion of diversity and professionalism of all individuals by

combating every form of discrimination, corruption and exploitation. The Supplier agrees to abide by collective bargaining agreements concerning wages and benefits.

**Workplace Safety:** the Supplier is committed to the promotion of health and safety by ensuring a healthy working environment for all of its employees through risk prevention and management and staff training.

**Protection of privacy:** the Supplier is committed to protecting personal and confidential information and adopts some of the most sophisticated and state-of-the-art IT security measures.

**Relationship with the community:** the values of social responsibility and sustainability are central to Targa Telematics and it requires these to be central to its Suppliers as well.

**Prevention of conflict of interest:** the Supplier must avoid and report any situation of risk between personal activities and tasks relating to the internal structure to which it belongs.



### 3.3. Ethical and Social Dimension

Each Supplier undertakes to manage its activities in accordance with the principles of legality, fairness and transparency.

**Contact with organized crime:** the Supplier shall not be linked to criminal activities in any way. Provision must be made for a thorough verification of the requirements of respectability and reliability of business counterparties, resulting in the exclusion of any counterparty suspected of belonging to or facilitating criminal organizations.

**Combating of corruption:** the Supplier is obliged not to practice or tolerate any kind of corruption, extortion or embezzlement. In addition, the Supplier may not offer illegal inducements to its business partners or accept these.

**Regularity of supplier contracts:** the Supplier undertakes to ensure staff working conditions compliant with applicable local regulations and relevant ILO Conventions on working hours, overtime, vacations, wages, benefits and housing conditions, and, where applicable, regularly pay social security contributions for each worker.



## 4. APPLICATION, DISSEMINATION AND MONITORING

### 4.1. Application and dissemination procedures

Targa Telematics applies this Code of Conduct to all Suppliers, companies and third parties, with whom it establishes collaborative relationships. Full acceptance of the document is a necessary condition for the formalization of the subsequent contractual relationship.

The Supplier shall ensure the maximum dissemination of the Code of Conduct, delivering it to all employees, collaborators and sub-suppliers, on the basis of which they undertake to comply with the provisions which it contains. The Supplier shall also ensure that all its workers, whether directly or indirectly involved in activities, are aware of the Code, using all appropriate and effective means of communication.

By signing the Code of Conduct, Suppliers will accept its terms and commit themselves with regard to Targa Telematics to full compliance with the minimum requirements that it establishes.

### 4.2. Verification

Targa Telematics reserves the right to monitor and verify that its Suppliers are compliant at all times with the requirements of this Code of Conduct.

Suppliers shall provide the information necessary to verify and evaluate the application of the principles of this Code of Conduct and in particular, provide evidence of their commitment to social and environmental issues.

Targa Telematics reserves the right, subject to prior notice, to conduct audits at all factories that produce its goods and at subcontractors or sub-suppliers. The audit may take place directly or through an independent third party entity appointed by Targa Telematics to ensure the compliance of the supplier with all contractual provisions and this Code of Conduct. The supplier shall provide access to premises and facilities for the appointees of Targa Telematics. It shall also provide all necessary assistance to enable the appointees to carry out their audit activities and make available all documentation relevant to the audit.



## ACCEPTANCE FORM

By signing this form, the recipient confirms that:

- it has received, analyzed and understood the provisions of the Supplier Code of Conduct of Targa Telematics and all its subsidiaries;
- it is committed to compliance with the Code and to the applicable local, regional and national laws and regulations relating to the location of its operations;
- it shall inform its employees, suppliers, external collaborators and other parties forming part of the supply chain, of the contents of this Code by all necessary means, and ensure that they also comply with its provisions;
- it accepts the monitoring methods reported within section 4.2 of the document;
- it undertakes, in the event of non-compliance, to implement the necessary actions to adapt its activities and operations;
- it undertakes to report any alleged or ascertained case of infringement of this Code to Targa Telematics.

Date (day/month/year): \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Place: \_\_\_\_\_

\_\_\_\_\_

Name or company name (in capitals): \_\_\_\_\_

\_\_\_\_\_

Name and position of the legal representative (in capitals): \_\_\_\_\_

\_\_\_\_\_

Signature of the legal representative:

\_\_\_\_\_



[www.targatelematics.com](http://www.targatelematics.com)