

# SUPPLIERS CODE OF CONDUCT

## Business integrity

Suppliers are expected to comply with all anti-bribery, anti-corruption, anti-money laundering, and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.

## Record keeping and documentation

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

## Professional conduct

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring the SCHOOL into disrepute.

## Confidentiality

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with the SCHOOL.

## B. Conflict of interest; gifts, benefits and hospitality

The SCHOOL believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed.

Little Genius International S.p.A. SB

cap. soc. 50.000,00 € i.v.

Via di Grotte Portella 28

00044 - Frascati (RM)

P.IVA e C.F. 08247621009

## Conflict of interest

Suppliers must:

- (a) declare to the SCHOOL managers under their contract, any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with the SCHOOL; and
- (b) avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with the SCHOOL.

## Gifts, benefits and hospitality

SCHOOL personnel must:

- (a) conduct themselves with the highest standards of integrity, impartiality and accountability; and
- (b) perform public duties without favouritism, bias or for personal gain.

The appropriate handling of offers of gifts, benefits and hospitality is critical to earning and sustaining public trust. As such, Suppliers are expected not to:

- (a) offer SCHOOL personnel gifts or benefits, either directly or indirectly, and offers of hospitality will be limited to token offers of basic courtesy (such as tea and coffee during a meeting); or
- (b) take any action in order to entice or obtain any unfair or improper advantage.

## C. Corporate governance

Commitment to sound management administration, risk and corrective action systems, are key to a reliable supply chain for the SCHOOL. Suppliers are expected to maintain sound administration processes.

## Risk assessment and management

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks

Little Genius International S.p.A. SB

cap. soc. 50.000,00 € i.v.

Via di Grotte Portella 28

00044 - Frascati (RM)

P.IVA e C.F. 08247621009

relating to labour and human rights, health and safety, the environment, business ethics, and corporate governance.

## Critical incident management

Suppliers should:

- (a) identify and assess potential critical incident, emergency situations and business continuity risks; and
- (b) develop and implement emergency plans and response procedures that minimise harm to life, environment and property, while minimising disruption to business continuity.

## Audits and assessments

To ensure compliance with this Code and the applicable laws, Suppliers are expected to:

- (a) perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and
- (b) cooperate openly and honestly with any SCHOOL audit, assessment or review.

## D. Labour and human rights

The SCHOOL believes that all workers in its supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into its business.

## Anti-discrimination

Subject to applicable laws, Suppliers are expected not to discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law, in hiring and other employment practices.

Little Genius International S.p.A. SB

cap. soc. 50.000,00 € i.v.

Via di Grotte Portella 28

00044 - Frascati (RM)

P.IVA e C.F. 08247621009

## Anti-harassment

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation and abuse. Suppliers are expected not to bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual or psychological.

## Human rights

Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

Consistent with relevant modern slavery legislation, Suppliers are expected to proactively identify, address and – where required by legislation – report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

## Prevention of involuntary and underage labour

Suppliers are expected to:

- (a) ensure that all work is undertaken without coercion;
- (b) not use any form of forced, bonded or indentured labour; and
- (c) employ only workers who are the applicable minimum legal age.

All use of temporary and outsourced labour should be within the limits of the law. Suppliers are therefore expected to:

- (a) use all reasonable endeavours to ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and applicable law; and
- (b) be responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies.

Little Genius International S.p.A. SB

cap. soc. 50.000,00 € i.v.

Via di Grotte Portella 28

00044 - Frascati (RM)

P.IVA e C.F. 08247621009

## Working hours, wages and benefits

Suppliers must:

- (a) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;
- (b) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- (c) pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

## Freedom of association and collective bargaining

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

## E. Health and safety

Worker health, safety and well-being is important to the SCHOOL. Suppliers are expected to provide a healthy and safe work environment and integrate sound health and safety management practices into its business.

## Workplace health and safety management

Suppliers must comply with all applicable laws relating to workplace health and safety.

Suppliers are expected to:

- (a) manage occupational health and safety hazards; and

Little Genius International S.p.A. SB

cap. soc. 50.000,00 € i.v.

Via di Grotte Portella 28

00044 - Frascati (RM)

P.IVA e C.F. 08247621009

(b) provide workers with job-related training and consult with employees in relation to the provision of information and training.

## F. Environmental management

The SCHOOL is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

### Environmental impacts

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

- (a) ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
- (b) maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
- (c) maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions

Little Genius International S.p.A. SB

cap. soc. 50.000,00 € i.v.

Via di Grotte Portella 28

00044 - Frascati (RM)

P.IVA e C.F. 08247621009