



PAGANI
PENS

prodir®

PIGRA

Premec

Code of Conduct

Pagani Pens SA is committed to exemplary social and ethical conduct: we believe that we bear responsibility for all persons involved in the production and support of our products and services worldwide. By trading with us, you are agreeing to support and apply our fundamental principles in the areas of **human rights, working conditions, the environment and combatting corruption**.

The provisions of this Code of Conduct set forth our expectations for all Partners registered with us and with whom we do business. Pagani Pens SA expects these principles to be applied by Partners and their employees, as well as any subsidiaries, affiliate entities and subcontractors thereof.

The provisions of this Code constitute the minimum standards, not the maximum. This Code of Conduct strictly obligates all Partners to observe and comply with all the fundamental principles expressed herein.

Respect of this Code of Conduct by Partners will determine the continuing commercial relationship between Partners and Pagani Pens SA.

1. Labour and human rights

Child labour: Pagani Pens does not tolerate child labour. The minimum working age is determined by existing national regulations and the relevant ILO standards. We support the use of legitimate workplace apprenticeship programmes in accordance with all applicable laws and regulations. Young employees under the age of 18 should not perform hazardous work, may be restricted from night work with consideration given to educational needs, and shall be entitled to more breaks than adults.

Discrimination: Pagani Pens ensures equality of opportunity and treatment with regards to employment and occupation, and does not tolerate discrimination based on race, skin colour, age, gender, gender identity, sexual orientation, ethnicity, disability, faith, political affiliation, union membership or marital status. Employees are treated with dignity and respect. Employees are not to be exposed to threats of violence or any other harassment or maltreatment of a physical, sexual, psychological, or verbal nature, that may harm the personal integrity of Employees.

Minimum wages: Pagani Pens ensures all employees are paid at least the minimum wage required by applicable laws and complies with laws and regulations relating to overtime, maximum hours, piece rates and other forms and components of compensation, and to provide legally mandated benefits. Wage payments are made at regular intervals and directly to employees; deductions from wages for disciplinary reasons are prohibited.

Working hours: Pagani Pens ensures that no employees are forced to work in excess of the number of hours permitted by applicable national law; where the law is silent, normal working hours shall not exceed 8 hours per day and 48 hours per week, and employees shall also be given at least an average of one day off for every 7 days period. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

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of Pagani Pens SA

Freedom of association: Pagani Pens recognises the right of employees to join or to form trade unions and to bargain collectively in accordance with local laws. Employees can communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

Forced labour: Pagani Pens ensures the prohibition of forced labour in all its forms; employees may leave the employer freely, providing they comply with advance notice periods specified by law. The retention of identity papers, passport(s), work permits and any other documents is prohibited. Inhumane treatment, physical punishment, sexual harassment, insults, harassment and mental or physical coercion are all prohibited and not tolerated.

Modern Slavery: Pagani Pens does not allow for any form of slavery or human trafficking and has zero-tolerance approach to Modern Slavery. Modern Slavery is a crime and a violation of fundamental human rights, and it encompasses slavery, servitude, forced compulsory labour, bonded and child labour and human trafficking, all of which include the deprivation of a person's liberty.

2. Environmental safety and production processes

Pagani Pens SA operates an effective environmental policy and complies with existing legislation and regulations regarding environmental protection; We ensure that programmes are in place at all our sites to minimise the environmental impact of our activities.

Chemicals and hazardous materials: Chemicals and other materials which may constitute a hazard if released into the environment are identified and managed to ensure their safe and proper handling, transport, storage, re-cycling or reuse and disposal.

Wastewater and solid waste: Wastewater and solid waste generated through operations, industrial processes and/or sanitation facilities are treated, monitored and controlled as required prior to being discharged.

Recycling and minimum waste: Pagani Pens operates a recycling policy. This means that waste is correctly recycled and not diverted into the environment, in accordance with local regulations; waste of all types, including waste water and energy, must be minimised or eliminated at the source.

Air emissions: Volatile organic chemicals, aerosols, corrosives, particulates and products which deplete the ozone or are combustible that are generated by and emitted as a result of operations are classified, monitored, controlled and treated as required prior to their discharge or disposal.

Pollution prevention: Pagani Pens ensures that all substances that present an environmental hazard are appropriately managed in order to prevent any risk of pollution in the event of their accidental emission or discharge, including into ground water.

Compliance with the EU Deforestation Regulation (EUDR): Pagani Pens is committed to receive products that are comply with EUDR, commodities have to come only from deforestation-free areas, suppliers have to Ensure compliance with local laws in the country of origin, maintain full traceability and geolocation data for all raw materials and conduct due diligence and risk assessments for all suppliers.



Compliance with the General Product Safety Regulation, (EU) 2023/988: Pagani Pens is committed to produce and check all safety features of their products in all the manufacturing stages, from the design phase to the release of products on the market

Conflict minerals 3TG: Pagani Pens is committed to guarantee that Tungsten carbide inside Metal ball pen tips does not originate from the DRC or an adjoining country (ref. U.S.A. Conflict Minerals Regulation), due diligence is performed on suppliers via CMRT template.

3. Health and safety

Pagani Pens SA provides a safe and healthy work environment for all employees. We identify and protect employees from any physical, chemical or biological hazards in the work environment; moreover, machinery, equipment and processes are safe and pose no risk to employees' health.

Industrial health and safety: Pagani Pens ensures that employees' exposure to chemical and physical agents is well identified, evaluated and controlled. Employees are provided with appropriate personal protective equipment, including gloves, masks, work clothes and safety shoes.

Emergency situations and response: Pagani Pens has comprehensively identified and assessed potential emergency situations and has minimized their impact by implementing emergency plans including emergency reporting, employee notification and evacuation procedures, employee training and drills, and the provision of appropriate fire detection systems, firefighting equipment and adequate exit facilities.

4. Ethical conduct

Anti-Corruption and Bribery, Pagani Pens adheres to the highest standards of moral and ethical conduct, respects local laws and not engages in corrupt practices in any form, including but not limited to extortion, fraud or bribery.

Practices like offering, promising, authorizing, making, soliciting, or accepting any form of bribe or kickback, directly or indirectly are strictly prohibited

Fraud, any form of fraud, including misrepresentation of information, falsification of documents, or unauthorized use of company assets, is strictly prohibited

Conflicts of interest: all Partners are expected to disclose to Pagani Pens SA any situation that may constitute a conflict of interest and to inform of any employees of Pagani Pens who may have an interest of any kind in the partners' business or any sort of economic connection with the Partner. Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of the company. Any potential conflicts must be disclosed to management

Money Laundering, Pagani Pens is committed to preventing money laundering and will comply with all applicable laws and regulations. Employees must report any suspicious activities

Reporting and Compliance, Employees and Partners are encouraged to report any unethical behavior or violations of the code of conduct. The company will investigate all reports and take appropriate action

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Gifts: Pagani Pens SA has a zero-tolerance policy and does not accept any type of gift. We expect that our Partners shall not offer to any staff member of our Company any benefit such as free goods or services, employment or sales opportunities to facilitate the partners' business with Pagani Pens SA.

Pagani Pens SA
Fausto Conti
Regulatory Affairs Manager



Cadempino
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