



PAGANI
PENS

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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: There must be no use of 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. 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: We expect our Partners to ensure equality of opportunity and treatment with regards to employment and occupation, and do 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 must be 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.

Minimum wages: We expect our Partners to ensure all employees are paid at least the minimum wage required by applicable laws and to comply 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 shall be made at regular intervals and directly to employees; deductions from wages for disciplinary reasons are prohibited.

Pagani Pens SA
Via Ponteggia 19
6814 Cadempino
Switzerland
paganipens.com

CHE-102.887.450

BU Pens
Prodir
Via Serta 22
6814 Lamone
Switzerland
T +41 (0)91 935 55 55
sales@prodir.ch
prodir.com

BU Pens
Pigra
Via Serta 22
6814 Lamone
Switzerland
T +41 (0)91 935 55 55
sales@pigra.com
pigra.com

BU Components
Premec
Via Ponteggia 19
6814 Cadempino
Switzerland
T +41 (0)91 960 11 11
sales@premec.ch
premec.ch

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Working hours: We expect our Partners to ensure 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.

Freedom of association: We expect our Partners to recognise the right of employees to join or to form trade unions and to bargain collectively in accordance with local laws. Employees shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

Forced labour: We expect our Partners to ensure 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, insults, harassment and mental or physical coercion are all prohibited.

2. Environmental safety and production processes

Pagani Pens SA expects its Partners to operate an effective environmental policy and to comply with existing legislation and regulations regarding environmental protection; Partners shall ensure that programmes are in place at all their sites to minimise the environmental impact of their activities.

Chemicals and hazardous materials: Chemicals and other materials which may constitute a hazard if released into the environment must be 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 must be treated, monitored and controlled as required prior to being discharged.

Recycling and minimum waste: We expect our Partners to operate 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 must be classified, monitored, controlled and treated as required prior to their discharge or disposal.

Pollution prevention: We expect our Partners to ensure 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.

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3. Health and safety

Pagani Pens SA expects its Partners to provide a safe and healthy work environment for all employees. Partners shall identify and protect employees from any physical, chemical or biological hazards in the work environment; moreover, machinery, equipment and processes must be safe and pose no risk to employees' health.

Industrial health and safety: We expect our Partners to ensure that employees' exposure to chemical and physical agents is well identified, evaluated and controlled. Employees must be provided with appropriate personal protective equipment, including gloves, masks, work clothes and safety shoes.

Emergency situations and response: We expect our Partners to have comprehensively identified and assessed potential emergency situations and to have 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

Corruption: We expect our Partners to adhere to the highest standards of moral and ethical conduct, to respect local laws and not to engage in corrupt practices in any form, including but not limited to extortion, fraud or bribery.

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.

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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