



ZAPI GROUP Policy

Supplier Code of Conduct

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Abbreviations & Nomenclature	
Name	Description

References
ZAPI GROUP 019 POLICY - CODE OF ETHICS
Zapi Group Global Terms and Conditions of Purchase

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1. GENERAL

At ZAPI GROUP, we are committed to a standard of excellence in every aspect of our business, to ethical and responsible conduct in all of our operations, to the respect of the rights of all individuals, and to respect for the environment.

ZAPI GROUP strongly encourages each Supplier to meet the following standards in all activities that relate directly or indirectly to ZAPI GROUP.

We expect Suppliers (as well as Sub suppliers and also Subcontractors) who do business with ZAPI GROUP, to implement the same commitments.

Suppliers that do not conform to these standards may have their business relationship with ZAPI GROUP terminated.

2. ETHICAL PRINCIPLES

2.1 Compensation and benefits

Supplier shall comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, and other elements of compensation, and will provide all legally mandated benefits. Supplier ensures equivalent compensation for the same job level avoiding gender gaps.

2.2 Hours of work

Supplier maintains work hours in compliance with all applicable wage and hour laws and regulations. Supplier does not require employees to work more than any limits on regular and overtime hours allowed by any applicable local law.

2.3 Forced Labor / Prison Labor

Supplier does not use forced or involuntary labor, including prison, bonded, indentured, or otherwise.

2.4 Freedom of Association

Supplier acknowledge the fundamental right of all employees to freely associate, join, or form trade unions or worker associations of their choice, without interference, intimidation, or retaliation.

Supplier ensure that its policies and practices support and do not hinder employees' exercise of their right to organize and engage in collective action for their mutual benefit and protection.

2.5 Child Labor

Supplier does not use child labor. "Child" is any person who is either younger than 16 or younger than the minimum age required for the employment under applicable law. Supplier will comply with all applicable laws and regulations regarding the employment of minors.

2.6 Non – Discrimination, women’s rights and gender equity

Supplier forbids any discrimination based on gender, race, ethnicity, religion, nationality, sexual orientation, disability, or any other protected characteristic under the law, during hiring practice/recruiting or any other condition of work.

Supplier ensures that men and women have equal access to career opportunities, training, development, and advancement within the company, based on skills and merit rather than gender.

Supplier ensures to consider rights of minorities and indigenous also.

2.7 Coercion and Harassment (modern slavery)

Supplier treats each employee with dignity and respect, and will not engage in or permit corporal punishment, threats of violence, or other forms of harassment whether based on race, color, gender, sexual orientation, national origin, religion, disability, age, or any other legally protected characteristic.

2.8 Workplace Safety & Emergency Planning

Supplier provides a safe and healthy workplace for employees by endeavoring to meet or exceed international safety standards (ISO 45001). Supplier must have procedures in place for handling emergencies such as fire, spills, and natural disasters.

2.9 Environmental Protection

Supplier, implementing a EMS according to ISO 14001, is fully comply with all applicable environmental laws, and seek ways to conserve natural resources and energy, reduce waste and the use of hazardous substances, minimize any adverse impacts on the environment and stop using any banned substances.

Supplier is active on GHG emission impact reduction, looking for more sustainable solution, implementing action to monitor water consumption and quality, taking action to reduce material waste increasing reasonable solution.

Supplier works according to material/chemicals rules following prohibition and declaration of substances request

2.10 Compliance with Applicable Laws

Supplier is comply with all laws and regulations applicable to their business, as well as the standards of its industry, including those pertaining to the manufacture, pricing, sale, distribution, labeling, import, and export of merchandise.

Without limiting this requirement, Supplier does not

- A. violate, misappropriate or infringe upon the intellectual property rights of ZAPI GROUP and its subsidiaries or any third party;
- B. engage in any activities which would violate any applicable laws and regulations relating to
 1. bribery or illegal payments;

2. laws against unfair competition, antitrust;
3. unfair and deceptive trade practices;
4. environment;
5. health and safety;
6. international trade, including exports and imports;
7. data protection/security and disclosure information;
8. money laundering;
9. contracting with governmental entities;

2.11 Gifts and Entertainment

ZAPI GROUP prohibits associates from soliciting gifts or entertainment of any kind from our business partners, including suppliers. Supplier will not bribe any ZAPI GROUP associate by offering or giving any gifts except as set forth below. Existing or prospective suppliers shall not offer gifts, entertainment or other gratuities to ZAPI GROUP associates other than customary business courtesies that are reasonable in frequency and value. ZAPI GROUP associates who have purchasing responsibilities may accept only business meals served during business meetings held at the facilities of suppliers or business meals when in travel status or promotional or advertising items having a truly nominal value, such as baseball caps, pens or calendars. Cash or cash equivalents (such as gift cards) shall never be offered to ZAPI GROUP associates by current or prospective business partners.

2.12 Accounting Records

Supplier's accounting records shall be kept and presented according to the laws of each applicable jurisdiction, in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses, and not contain any false or misleading entries.

2.13 Conflicts of Interest

Supplier shall immediately report to ZAPI GROUP any "conflict of interest" of which they become aware. A "conflict of interest" is any circumstance, transaction or relationship directly or indirectly involving the Supplier in which the private interest of any employee of ZAPI GROUP or any of its subsidiaries improperly interferes, or even appears to improperly interfere, with the interests of ZAPI GROUP and its subsidiaries.

2.14 Subcontracting

In addition to any restrictions on the use of subcontractors that are otherwise agreed between the Supplier and ZAPI GROUP or the applicable subsidiary, Supplier will not use any subcontractor in connection with any ZAPI GROUP or subsidiary business unless the subcontractor has received a copy of this Code of Conduct.

2.15 Monitoring, Compliance and Whistleblowing system

Supplier acknowledges that ZAPI GROUP, its subsidiaries, or our designated auditors (including third parties) may engage in monitoring activities to assess compliance with this Code of Conduct including on-site inspection of facilities and review of books and records.

Neither ZAPI GROUP nor any of its subsidiaries assumes any duty to monitor or ensure compliance with this Code of Conduct, and Supplier acknowledges that Supplier is solely responsible that its officers, directors, managers, employees, representatives and agents fully comply with this Code of Conduct .

ZAPI GROUP has activated a Whistleblower system at www.zapigroup.com in order to mitigate the consequences of violations and prevent future misconduct of this nature. Whistleblower could be used by anyone, including Supplier, to report concern, misconduct, unethical behavior, or illegal activity within ZAPI GROUP organization.

In accordance with ZAPI GROUP policy, Supplier is also encouraged to set up Whistleblower system on their own or join an industry-wide system.

2.16 Management System and Communication

Supplier shall establish and maintain processes that are reasonably designed to ensure compliance with, mitigate the risks identified in, and facilitate continuous improvement with respect to, this Code of Conduct. Supplier shall ensure that this Code of Conduct is adequately communicated to all employees.