

PONY SRL

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POLICY AND CONDUCT STATEMENT

Cavaglietto, 2nd May 2023

Pony S.r.l. is a totally Italian company, which has its legal and operational headquarters and production plant in Italy; it has no production site in other countries.

All the items it sells are designed and produced exclusively in the Cavaglietto (NO) plant, starting from raw materials that comply with all Italian and European Union regulations in force (see REACH-SCIP Declarations, Rohs, metals/minerals from conflict or high risk areas); Pony S.r.l. also complies with the export restrictions of products established by the European Union towards some non-European countries (e.g. Iran, etc.) or non-EU European countries (e.g. Russia, etc.) and it doesn't import from high risk or in conflict countries/areas.

Pony S.r.l. does not manufacture or market dual-use items-products referred to REGULATION (EU) 2021/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 May 2021, which establishes a Union regime for the control of exports, brokering, assistance technique, transit and transfer of dual-use items, listed in Annex I of the Regulation itself.

Pony S.r.l. selects customers of its products and suppliers of equipment and machinery, raw materials and few components primarily among Italian and European Union companies which, as far as known, comply with the relevant national and EU regulations in force and/or among companies in the western economic circuit (including Taiwan).

Since its inception, Pony S.r.l. has the EN UNI ISO 9001 certification (Quality Management System - QMS) which, as known, provides for compliance with numerous requirements and is issued every three years and confirmed every year, following inspections carried out by the certifying team which certify that the company has implemented and constantly maintains a quality management system that complies with the provisions of the standard itself. In this context, particular and continuous attention is given to the risk assessment process in its various aspects, in order to identify and define possible risks and the measures to be taken to contain and mitigate them.

Pony S.r.l., by its autonomous choice and code of conduct, carries out its business in scrupulous compliance with Italian-EU laws and regulations, in particular with regard to:

- **internal organizational structure and administrative accounting, in accordance with Italian and transparency laws, including the commitment to fair competition (antitrust), the fight against corruption and money laundering;**

- **respect for human and workers' rights, without any discrimination** (race, religion, sex, age, nationality, disability, personal relationships, political opinions, union membership, etc.), in order to guarantee equal opportunities and treatment for all, without any forcing, imposition and obligation;
- **personnel management**, carried out in accordance with the provisions of the **national collective labor agreements and in compliance with the rights recognized to workers**, in particular as regards working hours, wages, rest/holiday periods, health and safety occupational safety, trade union representation; particular attention is given to horizontal and vertical internal communication, in accordance with total quality management criteria; Pony S.r.l. is fully aware that the **company's personnel is an essential factor and pillar for its success** and therefore pays close attention in developing the **right team spirit and maintaining a serene, cordial, industrious and collaborative atmosphere** within the company between all employees;
- **adoption of all safety provisions and compliance with the relevant regulations**, to guarantee employees a healthy and **safe work environment**. In particular, Pony S.r.l. operates with the utmost attention to accident prevention and personnel training in order to avoid occasional injuries and illnesses caused by an unsafe work environment or by the use of equipment without respecting the safety standards;
- **personal data processing and privacy**, in compliance with EU regulation GDPR 2016/679 of the European Parliament and of the Council;
- adoption of security measures for the **protection of confidential information and intellectual property** both internally (any patents) and of the customers who purchase the articles/products of Pony S.r.l.
- **respect for the environment and the relevant regulations**, maximizing the recycling of processing waste, when reusable, minimizing waste to be disposed of in landfills, respecting **diversified collection, preventing soil, water and air pollution** and reducing the impact of production on the environment, thanks to a multi-year program of modernization and renewal of the equipment in use, in order to improve the energy efficiency of the production and of the plant;
- **use of machinery and its maintenance** in compliance with the provisions of the relative user manuals; the project to renew and upgrade the equipment and machinery is in advanced stage of implementation so as to reach the Industry 4.0 goal.

A handwritten signature in black ink, appearing to be a stylized name, is written over the text "Pony S.r.l.". The signature is fluid and cursive, with several loops and flourishes.