



SUPPLIER CODE OF CONDUCT

MACQ.61
Rev. 0
26/07/2023
Page 1 / 16

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E80 Group S.p.A.

Direzione e coordinamento: Eagle S.r.l.

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Capitale Sociale € 1.061.818 i.v. - R.E.A. della C.C.I.A.A. di Reggio Emilia n. 227884 - Codice Ateco 28.99.20

Codice Fiscale e Registro delle Imprese di Reggio Emilia IT01835150358

Contents

1. PURPOSE AND SCOPE	4
2. GUIDING PRINCIPLES AND STANDARDS	4
3. BUSINESS ETHICS AND INTEGRITY	5
3.1. Integrity, transparency and legal compliance	5
3.2. Fighting corruption	5
3.3. Economic responsibility	6
3.4. Conflict of interest	6
3.5. Fair competition	6
3.6. Protection of industrial and intellectual property	6
3.7. Privacy and information confidentiality	7
3.8. Product/service compliance and sustainable development	7
4. HUMAN RIGHTS AND SOCIAL PRACTICES	8
4.1. Human Rights	8
4.2. Child labour	8
4.3. Forced labour	9
4.4. Prohibition of discrimination and harassment	9
4.5. Freedom of association and collective negotiation	9
4.6. Health and Safety	10
4.7. Working hours and remuneration	10
4.8. Fair working conditions	11
5. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY	11
5.1. Compliance with environmental regulations	11



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Codice Fiscale e Registro delle Imprese di Reggio Emilia IT01835150358



SUPPLIER CODE OF CONDUCT

MACQ.61
Rev. 0
26/07/2023
Page 3 / 16

5.2.	Resource management and environmental impact.....	11
5.3.	Waste management.....	12
5.4.	Protecting biodiversity.....	12
6.	IMPLEMENTATION OF THE SUPPLIER CODE OF CONDUCT	13
6.1.	Implementation and monitoring.....	13
6.2.	Management of non-compliance cases	14
6.3.	Reports of violations and reference contacts	14
6.4.	Updates and revisions	15



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1. PURPOSE AND SCOPE

E80 Group¹ strives to maximise a value chain for the consumer products industry, while pursuing sustainable development of operations and the achievement of the highest ethical standards.

To E80 Group, excellence means providing customers with safe, innovative, integrated and quality products that support fair, sustainable and transparent supply chain practices.

Based on the provisions of its own Code of Ethics, along with those set forth in the System of Organisation, Management and Control, under Italian Legislative Decree No. 231/2001 and as part of integrating social responsibility into day-to-day operations, E80 Group considers of utmost importance that relations with its suppliers are built on transparency, mutual trust and full sharing of social, economic and environmental sustainability standards, as well as ethical-social values behind its work.

Understanding that responsible and sustainable business management is necessary across all levels of the supply chain to improve overall competitiveness of the company, E80 Group has decided, accordingly, to introduce this Supplier Code of Conduct ("Supplier Code of Conduct" or "SCC") setting forth the ethical standards and rules of conduct on top of the legal provisions, regulations and procedures that should govern any business relationships or contracts between E80 Group and its suppliers of goods or services, including sub-suppliers, contractors, sub-contractors and business partners, as well as any subsidiaries in the Group that said parties may belong to, wherever involved in the supply process ("Supplier").

Supplier shall do whatever is necessary to fully comply with this SCC, and is obliged to share its contents, and require compliance with it, from its staff and partners, promoting best practices that will ensure compliance with the Supplier Code of Conduct across the whole supply chain process, while also making sure that compliance is being monitored at all levels.

As proof of agreement, the Supplier is required to complete and sign for acceptance the Acceptance Form set out on the footer of the SCC. Alternatively, a specific clause of the contract shall be entered into, whereby the Supplier undertakes to comply with the provisions of the Supplier Code of Conduct and to enforce it in the conduct of all business dealings and relationships with E80 Group, throughout the full term of said relationships.

2. GUIDING PRINCIPLES AND STANDARDS

¹ E80 Group is intended as E80 Group S.p.A. and its investee and/or subsidiary companies.



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The Supplier Code of Conduct is inspired by the values and standards described within the Code of Ethics, and the ones behind the System of Organisation, Management and Control under Italian Legislative Decree No. 231/2001 as well as those underpinning the Integrated Policy as adopted by E80 Group, along with the key standards set forth by relevant international organisations, among them:

- the United Nations International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- the UN Convention on the Rights of the Child and Adolescent;
- the UN Convention on the Elimination of All Forms of Discrimination against Women;
- the United Nations Guiding Principles on Business and Human Rights;
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) and its applicable conventions;
- the OECD Guidelines for Multinational Enterprises.

It is understood that the Supplier shall comply with all applicable national and international laws and regulations.

3. BUSINESS ETHICS AND INTEGRITY

3.1. Integrity, transparency and legal compliance

E80 Group promotes and respects the principles of lawfulness, loyalty and fairness.

Supplier is required to strictly comply with these standards and to operate with utmost transparency in compliance with the legal and regulatory provisions applicable within its business environment, as well as any undertakings made to E80 Group (e.g. Code of Ethics, System of Organisation, Management and Control under Italian Legislative Decree No. 231/2001, contract).

In the event that the provisions of the Supplier Code of Conduct diverge from those of other applicable laws, regulations, and commitments made to E80 Group, the Supplier is required to ensure its compliance with the most rigorous standards consistent with applicable law and to report any such event to E80 Group, using the contacts listed in Section 6 of this document.

3.2. Fighting corruption

The E80 Group is committed to fighting active and passive corruption in both the public and private sector.



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Supplier must operate in full respect of lawfulness, showing a sense of transparency, integrity and fairness. Specifically, while conducting its business dealings, Supplier is prohibited from offering, promising, paying, requesting, receiving or accepting, whether directly or indirectly, money or any other form of benefit whatsoever for itself or others, including gifts or rewards beyond normal courtesy practices and which may be interpreted as intended to exert undue influence or obtain preferential treatment or improper advantages.

3.3. Economic responsibility

E80 Group does not tolerate any form of fraud, extortion, tax evasion and money laundering. Supplier is obliged to comply with all applicable national and international laws on accounting, taxation and transparency and to refrain from any form of fraud, extortion, tax evasion, avoidance, money laundering or other similar illegal conduct.

3.4. Conflict of interest

E80 works to prevent conflict of interest situations by strictly pursuing rules of fairness and impartiality. Supplier undertakes to avoid any situation that could lead to a conflict of interest, whether actual or potential, and shall inform E80 Group of any circumstances that create, or appear to create, any illegitimate favouritism, collusive practices or decisions resulting in illegitimate advantages.

3.5. Fair competition

E80 Group promotes the principles of free competition, loyalty and fairness in business as a way to develop the market and protect the interests of its customers. Supplier agrees to abide by these principles and not to engage in any unfair business practices that would result in violations of applicable fair competition and antitrust laws, and not to encourage or tolerate in any way human rights violations and other unlawful activities, including money laundering and any other form of terrorist financing.

3.6. Protection of industrial and intellectual property

E80 Group promotes the protection of industrial and intellectual property at all levels of its value chain.



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Supplier is required to act in full respect of the industrial and intellectual property rights of E80 Group and/or third parties, as well as in accordance with any requirements contained in laws, regulations and conventions set up for the protection of such rights, and to identify and report any infringement, even potential, of such rights.

Supplier is responsible for the safekeeping and preservation as well as the appropriate and correct use of corporate assets and resources made available by E80 Group to perform the work, and agrees not to use them for any purpose contrary to laws or regulations, protecting them from theft, abuse, sabotage, loss or damage.

3.7. Privacy and information confidentiality

E80 Group promotes personal data protection and information confidentiality in the management of business operations and activities.

Supplier undertakes to treat personal data and confidential information in compliance with data protection and confidentiality laws, as well as with the best practices as applicable in the jurisdictions of its operations. Supplier is required to provide the right to the protection of processed personal data, both its own and of third parties, by only using the personal data collected for legitimate, clearly defined purposes appropriate to the performance of its business and by ensuring that adequate technical and organisational security measures are in place. In addition, Supplier shall ensure that proper training is provided to staff members responsible for processing and privacy roles are properly assigned as part of business operations.

Supplier is also required to protect and make legitimate and appropriate use of any documents and information acquired, in any form, as a result of its relationship with E80 Group, and not to use such information and documents on any basis outside of that relationship. In particular, Supplier is required to seek E80 Group's permission before sharing any confidential information related to E80 Group with third parties.

In addition, Supplier is required to provide information security according to the relevance of the information by identifying and reporting any security breaches, even potential ones to E80 Group.

3.8. Product/service compliance and sustainable development

E80 Group promotes responsible development of its products, paying close attention to the safety and traceability of materials, components and products used throughout the whole value chain.



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The products and services offered by Supplier shall comply, on quality and safety, with applicable national and international laws and regulations, and shall meet -or exceed- industry standards of quality and safety as well as technical requirements and standards, as may be required by E80 Group.

Supplier is also required to comply with applicable regulations related to raw material sourcing, production, processing, marketing and distribution processes, considering any environmental and social impacts.

Supplier agrees to provide accurate and clear information as to the methods and resources used, production sites, and key features of the products or services provided, refraining from any misleading claims.

4. HUMAN RIGHTS AND SOCIAL PRACTICES

4.1. Human Rights

Respect for human rights is among the fundamental principles of E80 Group, which embraces the values as set forth in the United Nations International Bill of Human Rights and the relevant International Labour Organisation (ILO) Conventions.

Supplier is committed to act with full respect for human rights, including the rights of workers, within the scope of its activities and operations, recognising with no distinction the freedom and equality in dignity and rights of human beings, as set forth in the aforementioned international acts.

In particular, Supplier shall treat workers with dignity and respect, without subjecting them to degrading working conditions, and shall promote a culture and workplace where harassment, including sexual harassment, threats of harassment, or retaliation for reporting harassment, shall not be tolerated.

4.2. Child labour

E80 Group promotes respect for children's rights and the correct and harmonious physical, mental and emotional development of the individual.

Supplier is obliged to condemn and refrain from any form of child labour, in line with current legislation, the relevant ILO Conventions and the UN Convention on the Rights of the Child and Adolescent.

In particular, Supplier agrees not to directly or indirectly employ any under-age person who has not completed the period of compulsory education and reached the minimum age of admission to employment as defined by applicable law. The use of child labour in any form shall also be fought against.



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Supplier is explicitly prohibited from using workers younger than the age permitted by applicable laws and whose employment may impair or interfere with the physical, mental or moral development of the person employed.

4.3. Forced labour

E80 Group promotes the right to work and the principle of freedom to choose work, which must be performed under conditions freely agreed upon.

In line with the provisions of current legislation and the relevant ILO Conventions, Supplier is prohibited from availing or taking advantage in any way of any form of forced or compulsory labour, coercive labour or labour performed under restitution or slavery, involuntary prison labour or human trafficking.

In particular, Supplier is required to refrain from any form of modern slavery such as, but not limited to, using involuntary labour; keeping original copies of workers' documents or their valuables; requiring a deposit payment as a condition of employment or applying payroll deductions as a condition of employment; and operating restrictions on staff members' freedom of movement.

4.4. Prohibition of discrimination and harassment

E80 Group values diversity and inclusion and recognises the principles of dignity and equality, condemning all forms of discrimination based on age, racial and ethnic origin, nationality, political and trade union opinions, religious beliefs, sexual orientation, gender identity, physical and mental disabilities and any other non-work-related personality traits.

Supplier is required to refrain from any form of discrimination or prevarication towards its staff and partners, based on the principles of dignity and equality and ensuring equal opportunities for all, consistent with the relevant ILO Conventions.

It is also forbidden for the Supplier to engage in sexual, physical and psychological abuse, harassment or threats of any kind, physical disciplinary measures, intimidation as well as any inappropriate or disrespectful conduct towards its staff or partners.

4.5. Freedom of association and collective negotiation

E80 Group guarantees respect for workers' rights and promotes freedom of association and collective negotiation, including the right of workers to freely choose their representatives and to represent other workers.



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Supplier shall guarantee the right of workers to form trade unions and negotiate collectively, without distinction or discrimination and without fear of repercussions, in accordance with applicable laws and regulations.

4.6. Health and Safety

E80 Group lists the principle of occupational health and safety protection as one of its primary values, recognizing that workers play a central role for the company.

Supplier is required to comply with applicable legislation, as well as regulations and procedures implemented by E80 Group on health and safety, providing its staff members and partners with a safe, hygienic and healthy working environment, with due regard to the industry where they operate and any risks associated with activities and operations performed.

In accordance with the ILO Health and Safety Convention, Supplier agrees to work continuously in taking the necessary measures and steps to provide and maintain a safe and healthy working environment for all workers. This includes managing identified risks, preparing and implementing appropriate preventive measures, evaluating the effectiveness of such measures, and seeking continuous improvement.

Supplier is required to develop a sustainable health and safety culture within the company, preventing unlawful or dangerous behaviour and performing regular inspections to verify the existence and maintenance of adequate health and safety conditions for its staff members and partners in the workplace.

4.7. Working hours and remuneration

E80 Group complies with regulations on staff working conditions, providing fair wages, working time and rest periods in accordance with applicable regulations and relevant international standards.

Supplier undertakes to ensure full compliance with the regulations and collective labour agreements on working hours and overtime, including breaks, rest days, holidays and paid leave for different reasons. In particular, Supplier is required to provide its workers with maximum working hours and overtime in line with the provisions of the applicable legislation and the relevant ILO Conventions.

In addition, Supplier shall provide its staff with fair wages not lower than the minimum required by law and applicable collective agreements, and adequate to ensure decent living conditions.



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Codice Fiscale e Registro delle Imprese di Reggio Emilia IT01835150358

4.8. Fair working conditions

Supplier is required to provide its staff members and partners with an employment contract in a written, clearly understandable and legally binding form.

Supplier is also required to comply with the forms of employment governed by the applicable regulations, avoiding the use of any irregular procedure, including the employment of workers without regular residence permits. Supplier is expected to provide its staff members and partners with social security, welfare and insurance coverage in accordance with the applicable legal and regulatory provisions, as well as with the collective agreements enacted.

5. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

5.1. Compliance with environmental regulations

E80 Group is committed to respecting the environment throughout the entire production chain, considering the environment as a shared resource to be protected for the benefit of the community and future generations, with a view to sustainable development.

Supplier shall comply with and abide by applicable environmental protection and environmental crime prevention regulations and requirements, which include, among others: obtaining and maintaining environmental permits and approvals to carry out regulated activities; handling and disposal of hazardous materials; release of contaminants impacting air, water and soil; protection of natural resources and wildlife; prohibition or restriction in the use of specific substances; recycling of materials; and respect for environmental rights.

Supplier agrees to implement initiatives to improve its environmental performance.

5.2. Resource management and environmental impact

E80 Group promotes environmental protection and sustainability, efficiency of resources used and reduction of their consumption.

Supplier shall work carefully to respect the environment and the ecosystem in which it operates, integrating the principles of environmental sustainability within its supply chain, and using methods minimising its environmental impact, through the use of the best technologies that will allow maximising the use of energy and natural resources, while also reducing wastage and promoting reuse, re-purposing and



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recycling of such resources. Supplier is also required to run its business using resources responsibly to avoid affecting the needs of future generations, measuring and keeping track of the use of energy resources, drawing a distinction -wherever possible- between those produced from renewable and non-renewable sources.

Supplier shall also actively strive to contain energy consumption and improve the efficiency of its operations, reducing related emissions of climate-changing gases into the atmosphere and contributing to the achievement of national and international emission reduction targets.

Supplier is also required to use water resources responsibly, actively engage in appropriate measures to minimise water withdrawals, encourage water reuse, and improve discharge management.

Supplier's use of hazardous substances shall comply with the requirements imposed by law, in particular they shall prohibit the use of substances banned nationally and internationally as harmful to people or the environment, and implement appropriate measures for the management, storage and transportation of hazardous substances.

5.3. Waste management

E80 Group promotes responsible and sustainable waste management, reducing its ecological footprint and promoting a circular economy.

Supplier shall comply with applicable laws and regulations on handling hazardous and non-hazardous waste, ensuring proper treatment, storage, transportation and disposal.

In addition, Supplier agrees to request and be in possession of information regarding treatment, transportation and destination of waste generated at all stages of the production process.

5.4. Protecting biodiversity

E80 Group protects areas of high conservation value and promotes biodiversity.

The supplier is obliged to take the necessary measures to ensure that biodiversity is preserved in all its activities and across the whole supply chain. Supplier shall keep supporting documents relating to the history of land use and provide them on request.



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Codice Fiscale e Registro delle Imprese di Reggio Emilia IT01835150358

6. IMPLEMENTATION OF THE SUPPLIER CODE OF CONDUCT

6.1. Implementation and monitoring

The Supplier is responsible for ensuring its compliance with the principles and rules of conduct as defined in this Supplier Code of Conduct, as well as for disseminating them and enforcing them to its staff members, partners, suppliers, contractors, and any additional parties connected with the Supplier and involved in the supply chain process for E80 Group.

Supplier is required to take all appropriate steps as necessary to provide compliance of its activities and operations with the standards and rules of conduct set forth in the Supplier Code of Conduct. Achieving and maintaining full compliance with what is set forth in the Supplier Code of Conduct may involve a process of continuous, phase-based improvement for the Supplier, as well as efforts of increasing scale depending on the supplier's specific activities and operations.

E80 Group encourages the Supplier and all business partners to share any measures they have taken to improve their business practices, with a view to achieving (or increasing) compliance with the provisions set forth in this Supplier Code of Conduct, and also to take steps to provide for the effective detection and management by the Supplier of any reports of non-compliance with the SCC.

Supplier shall continuously monitor and document its compliance with this Supplier Code of Conduct, and keep records of compliance with the provisions and standards contained herein as well as with applicable regulations.

To provide compliance with the provisions contained in this Supplier Code of Conduct, E80 Group reserves the right to verify that Supplier complies with its obligations under the SCC, using the methods of tracking that would seem to be most appropriate for this purpose.

The audit process may take the form of inspections at the supplier's production sites and offices, or even requests for documentation, and may be conducted directly by E80 Group or by third parties contracted by E80 Group. These audits will be carried out without interfering with the activities of the Supplier.

Also, with a view to making sure that the SCC is fully enforced, E80 Group may need to conduct monitoring activities, either directly or through third parties, with respect to all suppliers, contractors, and additional parties related to the Supplier and being involved in the supply chain process for E80 Group.

E80 Group agrees to treat any information coming to its attention with the utmost confidentiality, fully respecting the intellectual property and commercial rights of the Supplier.



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Cases of refusal or non-cooperation in the performance of monitoring activities may be subject to assessment by the E80 Group and considered within the scope of cases of non-compliance, in accordance with the procedures outlined in Section 6.2 of this document.

6.2. Management of non-compliance cases

Should Supplier identify areas of non-compliance with the Supplier Code of Conduct, it is required to promptly notify E80 Group, as outlined in Section 6.3 below, and implement any corrective actions necessary to bring its activities and operations in line with the SCC, seeking -if appropriate- support from E80 Group to identify and agree on the most appropriate methods and timing.

Should non-compliance and non-fulfilment by the Supplier emerge, including through the audit activities described in the previous paragraph, Supplier may be required to report on the planned corrective actions within a reasonable timeframe and implement these actions, which will be monitored by E80 Group.

In accordance with the provisions of the Code of Ethics and the System under Italian Legislative Dec. 231/2001 of E80 Group, as well as based on the specific contract terms in force with the non-compliant Supplier, E80 Group reserves the right to terminate any relationship and/or terminate any contract agreement with the Supplier who refuses to identify and/or implement the aforementioned corrective measures, without prejudice to the right to claim compensation for any losses incurred.

Notwithstanding the foregoing, in the event that there is a serious and/or repeated violation or non-compliance by the Supplier with the provisions set forth in this Supplier Code of Conduct, E80 Group shall have the right to temporarily suspend the Supplier or, where appropriate, to terminate as of right any contractual agreement with the defaulting Supplier, as well as to claim compensation for the damage suffered.

6.3. Reports of violations and reference contacts

E80 Group strongly encourages informed use of the communication channels implemented by E80 Group for the acquisition and processing of any inquiries and the reporting of any good-faith reports involving alleged or ascertained violations of the provisions of the Supplier Code of Conduct.

Any inquiries regarding the SCC, including its interpretation and application, may be directed to the E80 Group contact persons directly involved in the management of the existing business relationship.

Notification of an alleged or established violation of this Supplier Code of Conduct must be received through the various reporting channels implemented by E80 Group, specifically:



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Codice Fiscale e Registro delle Imprese di Reggio Emilia IT01835150358

- Web platform called "Whistleblowing", available on the E80 Group website and accessible at the following link: <https://areariservata.mygovernance.it/#!/WB/e80>
- Ordinary mail, according to the methods set out in the ANAC Guidelines (Resolution 311 of July 12, 2023): O.d.V. c/o E80 Group S.p.A., Via Marconi 21 - 42030 Viano (RE) Italy

E80 Group undertakes to treat the report received with confidentiality and discretion, subject to legal obligations, and without any form of retaliation.

This general principle neither precludes nor limits any reporting obligations that may arise as a result of the reports, either to the Judicial Authority or to other competent authorities.

6.4. Updates and revisions

E80 Group undertakes to periodically review and update this document.



E80 Group S.p.A.

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Sede legale in Via G. Marconi, 21 - 42030 Viano (RE), Italia

Tel. (+39) 0522 762011 - Fax (+39) 0522 988481 - E-mail: info@e80group.com - PEC: e80group@pec.it - www.e80group.com

Capitale Sociale € 1.061.818 i.v. - R.E.A. della C.C.I.A.A. di Reggio Emilia n. 227884 - Codice Ateco 28.99.20

Codice Fiscale e Registro delle Imprese di Reggio Emilia IT01835150358

ACCEPTANCE FORM

E80 Group aims to foster virtuous and lasting relationships with its Suppliers to continue to encourage a sustainable and transparent equitable supply chain.

By signing this form, the Supplier hereby confirms that it:

- has received, analysed and understood the provisions of the Supplier Code of Conduct (SCC), which is an essential prerequisite for the contractual and/or commercial relationship with E80 Group;
- is committed to comply with the SCC and applicable local, national and international laws and regulations with respect to its activities and operations;
- will inform its employees, suppliers, external collaborators and other persons linked to the Supplier and forming part of the supply chain for E80 Group, by all necessary means, of the contents of this SCC and ensure that they too comply with its provisions;
- undertakes to take all appropriate steps to ensure the compliance of its activities and operations with the principles and rules of conduct defined in the SCC, with a view to continuous improvement and sustainable development of business activities;
- accepts the monitoring methods outlined in Section 6 of the document;
- undertakes, in the event of non-compliance, to implement the corrective actions necessary to adjust its activities and operations, as outlined in Section 6 of the document;
- undertakes to promptly report the E80 Group any alleged or ascertained case of violation of this SCC using the channels indicated in Section 6 of the document.

Date (day/month/year): __ / __ / ____

Place: _____

Company name or corporate name (in capital letters):

Name and position of the legal representative (in capital letters):

Signed by legal representative _____



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