

PA. 01:
SUPPLIER CODE OF CONDUCT

Revisions

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Approvals

APPROVED	DATE
BOARD OF DIRECTORS OF SINELEC S.P.A.	3 March 2025

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1. SUPPLIER CODE OF CONDUCT

We aim to make our responsible conduct a factor in our competitiveness and continual improvement and, therefore, success.

1.1 Sustainability for the ASTM Group

SINELEC S.p.A. (“SINELEC” or the “Company”) and its subsidiaries, Companies belonging to the ASTM Group (the “Group” or the “ASTM Group”), aware of the importance that sustainability has in defining government and company strategies, undertakes to work responsibly and transparently, in line with its sustainability policies, incorporating sustainability within its business strategy.

In its Sustainability Plan the Group outlined its sustainability commitments in terms of real actions and results.

Since 2016 ASTM Group and since 2023 SINELEC have also prepared a Sustainability Report, in compliance with reference standards and regulations, which is a fundamental instrument for reporting its non-financial performance.

The Group’s activities focus on topics associated with environmental issues, fighting corruption, the quality and the timeliness of provided services, respect for human rights and the application of fair contractual conditions.

The ASTM Group recognises the importance of guaranteeing a transparent supply cycle and regulating the environmental impacts to protect its stakeholders. To this end, it strives to select suppliers and manage relationships with suppliers in accordance with the criteria of transparency, fairness and impartiality, preventing conflicts of interest, even potential ones, in full compliance with relevant company organisational procedures.

The ASTM Group’s objective is to pursue the responsible management of its supply chain, based on collaboration with its suppliers to achieve common and shared objectives in terms of environmental and social sustainability and compliance with the principles of fairness and transparency in managing business relations.

With this in mind, SINELEC has adopted this Supplier Code of Conduct (hereinafter also referred to in short as the “Code” or “Code of Conduct”), which incorporates the principles of the Group’s Code of Ethics and Conduct (“Code of Ethics”), the acceptance of which by suppliers is mandatory in order to do business with the Group.

This Code cements the Group’s commitment to applying international standards, such as the “Ten Principles” of the United Nations Global Compact (UNGC), the Universal Declaration of Human Rights and the International Labour Organization’s (ILO) Fundamental Conventions¹.

1.2 Purpose

Through this Code of Conduct, SINELEC aims to share its values and principles of conduct with its suppliers and to define the rules of conduct that they must adopt towards their own employees and sub-suppliers in order to implement a socially, environmentally and economically sustainable procurement cycle. This Code applies in conjunction with all current legislation in the countries in which the Company works and in addition to all the

¹ For more information, please see the Code of Ethics, the Sustainability Policies and the Sustainability Plan, available on the company’s website.

principles listed in the Code of Ethics and in current company procedures.

1.3 Recipients and scope of application

This Code applies to any individual, entity, company, partner or other supplier (hereinafter “Supplier”) of any activity, good or service to the Company. For this reason, the Code applies without limitation to supplies relating to all Company product classes.

Furthermore, every supplier is responsible for ensuring that its employees and any subcontractors are informed about the principles given in the Code and that these parties comply with its application. When new contracts are signed or existing contracts are updated, the Code must be shared and accepted by all parties involved.

SINELEC reserves the right to carry out, through its own personnel or through third-party organisations appointed by the Company, audits/inspections at its supplier premises regarding compliance with this Code, with or without prior notice, and expects that any shortcomings or inadequacies found as a result of the audits carried out will be promptly remedied by its suppliers through the implementation of appropriate corrective measures.

When new contracts are signed or existing contracts are updated, the Code must be shared and accepted by all parties involved.

1.4 General terms and conditions

The Company conducts its business in compliance with national and international laws, current regulations and in observance of the principles defined in the Code of Ethics and the Sustainability Policies including the Anti-corruption Policy and the Management System for the prevention of corruption UNI ISO 37001. The Company, therefore, undertakes to implement all measures required to prevent and avoid corruptive practices and conflicts of interest. The Company asks that all its suppliers and subcontractors, in turn, commit to sharing the principles of this Code of Conduct, compliance with which is an important component in the supplier selection and assessment process. Moreover, the Company expects that its Suppliers adopt the principles of conduct given in this Code of Conduct and apply them along their entire supply chain.

2. PRINCIPLES

2.1 Ethics

Integrity

The Supplier is obligated to conduct its business in compliance with the generally recognised principles of ethics and integrity and to use organisational systems that are consistent with the principles outlined in the Code of Ethics adopted by the Company, in order to maintain long-lasting, honest and transparent relationships with the Company.

Anti-corruption

The Supplier is obligated to abstain from any form of active and/or passive corruption and/or extortion and to refrain from promising, offering or accepting advantages and/or undue utilities and/or improper benefits of any kind that have corruptive ends.

Fair Competition

The Supplier is obligated to conduct their business in accordance with the rules of proper and fair competition in compliance with relevant legislation.

Privacy

The Supplier is obligated to respect current data protection laws and adopt suitable security tools to protect the confidentiality of the information that it learns in the course of its business, also to ensure that all its employees and collaborators comply with these guidelines.

Reporting Suspected Irregularities

The Supplier undertakes to make the suitable means and tools available to its employees, including IT tools, to report any suspected irregularities or potentially illicit and/or illegal activities or behaviour in the workplace. Any reporting of any kind must be considered strictly confidential and treated as such by the Supplier, which also undertakes to protect whistleblowers from any form of retaliation.

2.2 Labour

Unauthorised Work and Child Labour

The Supplier is obligated to ensure the utmost respect for persons and to comply with the applicable labour laws, refraining from any form of unauthorised work, whether forced or child labour, in line with ILO Convention no.138 on minimum age and ILO Convention no. 182 on eliminating the worst forms of child labour.

Freedom of Workers – Freedom of Association – Collective Bargaining

The Supplier is obligated to guarantee its employees the right to freedom of association and the application of collective bargaining in the applicable sector, in compliance with all current laws and regulations. The Supplier undertakes not to make use of forced, bonded or involuntary labour in any shape or form.

Working Conditions

The Supplier is obligated to ensure that employees have working conditions that respect human dignity and comply with current sector legislation concerning hours worked (and working hours), overtime, pay and social security contributions, paid leave, holiday pay and sick pay. The Supplier also undertakes to provide opportunities for employee training and education and guarantee a working environment that complies with the health and safety requirements put in place by current legislation.

Diversity and Equal Opportunity

The fair treatment of all employees and the protection of diversity, as stated in the Diversity and Inclusion Policy adopted by the Company, must be one of the fundamental principles of the Supplier's business policy and decisions. Therefore, pursuant to ILO Convention no. 111 on discrimination, the Supplier is obligated to promote this principle, ensuring that no form of discrimination regarding gender, race, religion, age, disability, sexual orientation, nationality, social origin, trade union membership or any other illegal criterion under applicable law occurs in the workplace. The Supplier is obligated to ensure that its employees are not subjected to any kind of harassment and to promote an inclusive working environment based on integration and support.

2.3 Quality, health, safety and the environment

Workplace Health and Safety

The Supplier undertakes to protect its employees and collaborators from risks in the workplace. The Supplier is therefore obligated to adopt all the necessary precautionary measures in order to guarantee the health and safety of its employees and collaborators and to mitigate the risks that they are exposed to in the workplace. The Supplier is also obligated to carry out training and provide the necessary information so that its employees and collaborators are aware of the risks connected to their job. The Supplier is also obligated to ensure compliance with all current occupational health and safety laws and regulations and to ensure suitable controls, occupational safety procedures, preventative maintenance and technical protection measures required to limit risks to health and safety in the workplace.

Quality

In order to supply products and services that adequately meet the Company's requests and needs, the Supplier is obligated to comply with the quality and safety standards and prerequisites required by the relevant legislation in force, as well as comply with the quality standards established in the contract.

Emergency and Risk Management

In order to limit exposing its employees and collaborators to any risks, the Supplier is obligated to manage risks and emergencies connected to its business activities by promoting the implementation of identification systems, prevention and management practices, response procedures and suitable training and information.

Efficient Use and Conservation of Resources – Climate Protection

The Supplier is obligated to use all resources involved in the production cycle efficiently and responsibly, as well as to make use of sustainable supply sources and use renewable energy where possible.

The negative impact on the environment and climate must be reduced or eliminated at the source or through practices, such as changing production and maintenance processes or replacing, conserving, recycling and reusing materials.

Waste and Emissions

All activities that may have potentially harmful effects on people's health and/or the environment must be suitably managed, measured, controlled and treated before any substance is released into the environment. Therefore, the Supplier is obligated to monitor and control the impacts of its business activities on the local area and to adapt to legislative requirements concerning waste management, guaranteeing recycling, recovery and/or reuse or disposal at suitable sites, where possible, and adopt cautionary measures for conscious management of water consumption. The Supplier also undertakes to set up systems to prevent or reduce greenhouse gas emissions and/or the discharge of pollutants (into the air, sea, surface water and groundwater) in order to limit the environmental impact of its business activities.

Product and Process Safety

The Supplier shall make available safety data sheets that contain all the required and relevant safety information regarding hazardous substances. The Supplier is obligated to adopt safety programs to manage and maintain all production processes, in compliance with applicable safety standards and handle issues concerning products and their potential impact at all stages of the production process.

2.4 Additional aspects

Legal and other requirements

The Supplier undertakes to respect all laws, regulations, contractual agreements in force and generally recognised standards.

Documentation

The Supplier is obligated to prepare and keep up-to-date suitable documentation to show the implementation of the principles and values expressed in this Code of Conduct and to make this documentation available to the Company upon request. The supplier must keep, throughout the duration of the contract, documentation proving compliance with the provisions of this Supplier Code of Conduct.

Training and Expertise

The Supplier is obligated to put appropriate training measures in place for its managers, employees and collaborators to provide them with a suitable level of knowledge and understanding of the contents of this Code of Conduct, applicable laws and regulations and generally recognised standards.

Continuous improvement

The Supplier is obligated to continually improve its performance in compliance with the principles of the Code of Conduct and implement all the appropriate measures to do so.

3. IMPLEMENTATION, CONTROL AND MONITORING

3.1 Stakeholder engagement

SINELEC believes that engagement with its suppliers is fundamental for the implementation of effective strategies in the management of ESG issues, and that the promotion of this Code is crucial to its success. For this reason, SINELEC is committed to promoting and disseminating a culture of environmental, social and governance sustainability by creating awareness and fostering commitment among all its suppliers.

3.2 Whistleblowing

All persons with a relationship with the Company are required to promptly report any doubts around any requirement of the Code, as well as any alleged or actual violation thereof and/or of the law. This includes violations committed by any employee, consultant, partner or other representative acting in the name of and/or on behalf of the Supplier or the Company.

In accordance with the “Whistleblowing Management” procedure, which can be viewed on the Sinelec’s website at <https://www.sinelec.it/whistleblowing/>, reports may be sent to the attention of the Company via the following channels:

- in written or oral form via the specific digital platform accessible at <https://astm.integrityline.app>;
- in writing via ordinary or registered mail sent to the following address: SINELEC S.p.A. SP 211 della Lomellina 3/13 – Località San Guglielmo, 15057 Tortona (AL) Italy;
- in oral form through a meeting with the person responsible for receiving the report.

The utmost confidentiality in regard to the whistleblowers is guaranteed when managing reports, without prejudice to legal obligations. Furthermore, in the event of reports not made anonymously, the Company will not engage in any retaliatory actions (disciplinary sanctions, demotion, suspension, dismissal or the termination of collaborative relationships) nor will it discriminate – in any way – against whistleblowers who have acted in good faith to report events or situations that are in violation of this Code.

3.3 Disciplinary system

SINELEC strives to identify, assess, prevent and mitigate the risks associated with the issues covered by this Code, by promptly taking appropriate action to remedy the situation should any events occur. Compliance with this Code is an integral part of the contractual obligations of suppliers. Any violations will therefore lead to the application of the measures laid out in the applicable law. Failure to comply with the Code may lead to the termination of the contract, assignment or, more generally, the relationship that exists with the Company, as well as claims for damages – when applicable conditions are met.

4. Code Approval and Distribution

By resolution of the Board of Directors, SINELEC S.p.A. approves this Supplier Code of Conduct and promotes its adoption by all its subsidiaries, which will adopt this document autonomously. SINELEC and its subsidiaries will work to encourage the implementation of this Supplier Code of Conduct by the companies in which it holds a non-controlling interest (including joint ventures).

SINELEC publishes this Code on the company website and its intranet and promotes its distribution to all Recipients using the methods deemed most appropriate.

This Supplier Code of Conduct is subject to periodic revision when national and international regulations or the principles and values referred to as best practice, are subject to revision or, in any case, when the opportunity arises in relation to strategic and/or operational changes and variations or the results of materiality analyses.