



## SUPPLIER CODE OF CONDUCT

## CONTENTS

1.	SUPPLIER CODE OF CONDUCT .....	3
1.1.	Sustainability for the SINELEC S.P.A. Group .....	3
1.2.	Purpose .....	4
1.3.	Scope of Application .....	4
1.4.	General Conditions .....	4
2.	PRINCIPLES .....	5
2.1.	Ethics .....	5
2.2.	Labour .....	6
2.3.	Quality, Health, Safety and the Environment .....	7
2.4.	Company Management Systems .....	9
3.	CODE APPROVAL AND DISTRIBUTION .....	10

## 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 SINELEC S.P.A. Group

SINELEC S.P.A. (“SINELEC.” or the “Company”) and its subsidiaries (the “Group” or the “SINELEC S.P.A. 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 Policy, incorporating sustainability within its business strategy.

The SIAS Group in its 2017-2021 Sustainability Plan, “Going Global Sustainably”, has set out the commitments made regarding sustainability in actions and concrete results.

Since 2016, the SIAS Group has also drawn up, in compliance with the relevant standards and regulations, the Sustainability Report, a fundamental tool for reporting on its non-financial performance. The Group's activities focus on fighting corruption, quality and the timeliness of provided services, in compliance with human rights and the application of fair and economically sustainable contractual conditions.

SINELEC recognises the importance of guaranteeing a transparent supply cycle and regulating its social and 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.

With this perspective, to ensure that the principles inspiring supplier selection and assessment become increasingly important, SINELEC. has issued this Supplier Code of Conduct (“Code” or “Code of Conduct”), which must be accepted by suppliers in order to enter into commercial relationships with the Group.

This document 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 Conventions.

## 1.2. Purpose

Through this Code of Conduct, SINELEC intends to involve its suppliers in the construction of a supply cycle that is socially and environmentally sustainable. This Code applies in conjunction with all current legislation in the countries in which the Company works and in addition to all the principles listed in the Code of Ethics and Conduct (“Code of Ethics”) and in current company procedures.

## 1.3. 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.

The Company reserves the contractual right to conduct inspections of its suppliers, also with third party support, to monitor the implementation of the Code.

## 1.4. General 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 Policy. 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 (hereinafter also “Suppliers” or, singularly, “Supplier”) 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 behavior 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.

## 22. 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 must be a fundamental principle of the Supplier's business policy and decision-making process. 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 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.

## 24. Company Management Systems

### 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.

### 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. CODE APPROVAL AND DISTRIBUTION

SINELEC approves this Supplier Code of Conduct by resolution of the Board of Directors. This Supplier Code of Conduct is subject to control by the Quality & Compliance function. This Supplier Code of Conduct is also subject to periodic review if the national and international regulations to which they refer in the quality of best practice are subject to changes or jurisprudential interpretations or in any case where there is a need.