

Supplier Code of Conduct



SUPPLIER CODE OF CONDUCT

SOFINTER GROUP

Approved by resolution of the Board of Directors of Sofinter S.p.A. – December 17, 2024

Supplier Code of Conduct

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1. SUPPLIER CODE OF CONDUCT

The Sofinter Group (hereinafter also referred to as the “Group”), a socially responsible company at an international level, inspires its work by strict ethical, social and environmental principles to which it attaches the utmost importance, also inviting its suppliers and their respective supply chains to share the same commitment.

In particular, Sofinter Group Suppliers are required to comply with the Group Code of Ethics, all applicable laws and regulations, as well as the contractual obligations and terms contained in this “Supplier Code of Conduct”.

This Supplier Code of Conduct is an integral part of the contracts entered into with the Suppliers and any violation or failure to apply the principles and obligations set out therein may result in breach of contract and lead to decisions such as early termination of the contract.

Any obligation or principle not provided for in this Supplier Code of Conduct is understood to be supplemented by the Group Code of Ethics, to which the Suppliers are also bound and the violation of which may result in the same consequences as above.

It is understood that this Supplier Code of Conduct requires in any case compliance with all applicable national and international regulations. Where the legislation and this Code address the same topics with different standards, the highest standards and the most restrictive provisions will apply.

It is essential that all Group Suppliers comply with the principles contained in this Supplier Code of Conduct. In addition, the Group requires that Suppliers, in turn, ensure that these principles are also understood and respected by their employees, subcontractors and third parties with whom they work, so as to guarantee ethics and transparency also in their activities.

This Supplier Code of Conduct has been approved and adopted by the Board of Directors of Sofinter S.p.A. and implemented by the Group Companies to which it applies.

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2. MINIMUM STANDARDS AND PRINCIPLES OF GOOD CONDUCT

COMPLIANCE WITH LAWS

Suppliers are required to conduct their activities according to criteria of legality, professional integrity, transparency, diligence and fair competition, as the Group considers these prerequisites fundamental in creating business success.

Suppliers undertake to comply with all applicable laws, regulations and agreements, as well as to understand and agree to comply with relevant regulations in the places where they operate, whether national, regional or international.

Suppliers shall comply with applicable tax and customs laws.

DATA PROTECTION AND INTELLECTUAL PROPERTY

Suppliers must comply with all applicable laws and regulations on the protection of personal data, including data security, as well as their respective regulations, such as the EU Regulation better known as "GDPR" (acronym for General Data Protection Regulation), in particular with reference to the personal data of customers, end-users, employees and shareholders. Providers shall comply with all of the above requirements when collecting, recording, hosting, processing, transmitting or using or deleting personal data.

Suppliers, in addition to guaranteeing confidentiality, must guarantee the security of information according to its relevance and, where necessary, carry out a risk assessment to identify the most appropriate security measures. Suppliers are required to acknowledge and respect the intellectual property rights of the Sofinter Group and/or third parties such as, by way of example, trademarks, trade names, signs, companies, patents, know-how, designs, models, copyrights, identifying and reporting any infringement, even potential.

ANTI-CORRUPTION

Suppliers are required not to directly or indirectly request, undertake, offer, promise, pay, authorise, accept and request money (including bribes and/or facilitating payments) or other benefits aimed at obtaining an advantage, whether the undue advantage is offered directly or through an intermediary, in line with the Sofinter Group Anti-Corruption Manual available on the website www.sofinter.it and which the Suppliers undertake to comply with.

The Suppliers refuse any act of corruption, in any form that is implemented, both towards public and private entities.

FAIR COMPETITION

Suppliers undertake to comply with applicable competition and antitrust laws.

CONFLICT OF INTEREST

Suppliers are required to make every effort to prevent the occurrence of situations that may create an actual, perceived or potential conflict of interest within their business relationship with any member of the Sofinter Group.

CORPORATE INTEGRITY AND TRANSPARENCY

Suppliers are required to execute all business agreements and transactions in a transparent manner and to record them accurately in their books and records according to applicable laws, and must not conduct or facilitate any form of money laundering or use confidential information to engage in or support insider dealing.

ORGANIZED CRIME

Suppliers must ensure that they are not linked to or entertain relationships of any kind with criminal organizations or in any case operating outside the lawfulness such as, by way of example but not limited to, people linked to the environment of recycling and usury.

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SUBCONTRACTORS

Suppliers must receive prior approval from the relevant Group Company to subcontract any part of the service to be provided. Such approval is subject to the acceptance, by the Suppliers themselves, of this Code, the Group Code of Ethics and all other applicable provisions.

TRADE RESTRICTIONS AND INTERNATIONAL SANCTIONS

Suppliers are required to comply with trade restrictions and international sanctions regulations, taking into account their amendments and additions, as well as export control laws and regulations.

TRANSPARENCY OF INFORMATION AND PROFESSIONALISM

Suppliers must provide clear and accurate information about the methods and resources used, the production sites and subcontractors, and the characteristics of the products or services provided, and must refrain from making misleading statements.

Suppliers must carry out their activities with the utmost competence and professionalism in order to provide the Group with a high-quality service, in compliance with the agreements defined.

GIFTS AND GIFTS

Any exchange of gifts, gifts, money and any other benefit in favour of third parties, both private individuals and members of the Public Administration, such as to alter the normal relationships of collaboration, professionalism and impartiality of judgment, unduly favouring the interests of the Sofinter Group and/or one of the Group Companies is prohibited.

In addition, any offer in the form of rewards, gifts or invitations to employees of the Sofinter Group or their family members for the purpose of obtaining an order or the award of a contract is strictly prohibited. However, gifts and invitations may constitute acceptable expressions of courtesy in the context of an established business relationship, provided that their scope and value are limited, that they are offered openly, that the law of the country concerned authorizes this practice, and that they are not offered in anticipation of a benefit in return.

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3. HEALTH, SAFETY AND WORKERS' RIGHTS

HEALTH AND SAFETY OF WORKERS

Suppliers must do everything possible to put into practice a high level of standards in the field of health and safety in the workplace, adopting an approach to occupational health and safety management in accordance with best practice.

Suppliers shall comply with applicable laws and regulations regarding health and safety in the workplace, providing a safe and healthy working environment in such a way as to preserve the health of employees, safeguard third parties and prevent any risk of accidents, illnesses and injuries. This includes regular occupational hazard analyses and the implementation of appropriate precautionary and hazard control measures. Employees must be properly educated and trained in health and safety.

WORKERS' RIGHTS

CHILD LABOUR

Suppliers shall not hire any employee under the minimum age of employment required by law in any national or local jurisdiction. If not defined, the minimum age of employment will be considered 15 years. Employees under the age of 18 will only perform work in accordance with legal requirements (e.g. in relation to working hours and working conditions) and subject to any vocational education and training requirements.

FORCED LABOR

Suppliers shall not engage in any forced, bonded or involuntary labour. Any form of work must be voluntary. Workers will need to be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal documents). Suppliers shall ensure that employees do not pay or make payments in connection with obtaining employment throughout the recruitment process and during the period of employment. Suppliers will be responsible for the payment of all contributions and expenses related to workers, where legally required. Mental and/or physical punishment and coercion are prohibited. Disciplinary policies and procedures will have to be clearly defined and communicated to workers.

NON-DISCRIMINATION – FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers are required to refrain from any form of discrimination against their employees and collaborators, inspired by the principles of dignity and equality, 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 personal characteristic not related to the work sphere.

PROHIBITION OF ILLEGAL, CLANDESTINE AND UNDECLARED WORK

The Suppliers are required to comply with current legislation that prohibits the exploitation of illegal, clandestine or undeclared work, ensuring compliance with contribution, wage and tax obligations and labour regulations, rejecting any form of unlawful exploitation of the labour used, hired or employed.

COMPLIANCE WITH THE REGULATIONS ON RESIDENCE PERMITS

Suppliers must use workers who are in compliance with the regulations on residence permits.

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4. ENVIRONMENT

Suppliers must seek to improve the efficiency of the resources used and reduce their consumption, including raw materials, energy, water and fuel. Suppliers are required to take reasonable steps to eliminate or reduce the level of waste (both solid and wastewater) generated and to improve its disposal, as well as the reuse and recycling of the waste. Suppliers are encouraged to develop and use innovative and environmentally friendly practices that reduce negative environmental impacts. Suppliers must take reasonable steps to minimize emissions of greenhouse gases and toxic and hazardous pollutants.

Suppliers are required to adopt the highest standards of environmental management in their processing, in particular:

- use resources efficiently and responsibly;
- reduce emissions;
- promote environmental protection, not harming natural ecosystems;
- offer sustainable products and materials to the market;
- improve the environmental performance of materials and manufactures, with particular reference to the products supplied to the Group.

PRODUCT INFORMATION

Information relating to the origin, composition, health and safety of products must be communicated accurately, kept constantly updated and kept available to the Group in accordance with national and international regulations. Suppliers must ensure the traceability of raw materials and substances used in production processes, ensuring that they comply with current legislation and undertake to immediately inform the Sofinter Group in the event of potential non-compliance or potential risks to health and safety, and to guarantee the traceability of products and their storage in correct conditions.

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5. IMPLEMENTATION, COMPLIANCE AND MONITORING

The relationship between the Group and its suppliers is based on the principles of legality, transparency, fairness, trust and collaboration.

The Sofinter Group requires that all its Suppliers and Subcontractors share the principles expressed in this Supplier Code of Conduct; compliance with it is a necessary condition for initiating and maintaining a business relationship with the Group. The signing of new supply contracts or the renewal of existing contracts, as well as any purchase order placed by the Group, will entail as an integral and essential part the sharing of this Supplier Code of Conduct, which can be downloaded in updated form from the www.sofinter.it website.

Suppliers will endeavour to comply with all applicable laws, regulations, contractual agreements, standards and generally recognised technical regulations. They will also commit to communicating the principles set out in this Supplier Code of Conduct to the supply chain.

Suppliers are encouraged to implement the necessary mechanisms to identify, determine and manage risks in all areas covered by this Supplier Code of Conduct and to comply with all applicable legislative requirements. They are also invited to maintain appropriate documented information to demonstrate the sharing and implementation of the values expressed in this Supplier Code of Conduct. Subject to agreement with the Supplier, the Group reserves the right to carry out audits relating to the implementation of the principles set out in the Supplier Code of Conduct.

Suppliers may report violations of this Supplier Code of Conduct or any unethical behaviour by Group employees, even in a confidential and anonymous manner, through the following channels:

Sofinter S.p.A., Piazza Buffoni, 3 – 21013 Gallarate – Varese, for the attention of the Guarantor of the Code of Ethics;

E-mail: ethicscode@sofinter.it.

It is the responsibility of the Guarantor of the Code of Ethics to examine the reports received and manage them according to company protocols.

The Group, in line with current legislation, also has a Whistleblowing Procedure that can be downloaded in updated form from the website www.sofinter.it.

Failure by Suppliers to comply with the principles of this Supplier Code of Conduct may affect their status as Group Supplier, as well as result in the termination of relations with the Sofinter Group, depending on the circumstances and the seriousness of the violation; Violations will be analyzed on a case-by-case basis and will be dealt with in accordance with all applicable internal procedures, agreements, and legal requirements.

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ACCEPTANCE

The undersigned Company/Company _____, as
Supplier

as part of relations with the Sofinter Group

declares that:

- to have taken note of the contents of the Supplier Code of Conduct and to share them;
- undertake to respect, also in the name and on behalf of the shareholders, directors, employees and collaborators of the declaring Company/Company, the Supplier Code of Conduct according to an approach oriented towards development and continuous improvement;
- undertake to obtain from its subcontractors and subcontractors, in the context of relations with the Sofinter Group, the signing of a declaration relating to the full sharing and acceptance of the Supplier Code of Conduct in line with this document;
- undertake to promote compliance with the Supplier Code of Conduct by its supply chain used to serve the Sofinter Group.

This declaration must be digitally signed by the legal representative. Alternatively, this declaration can be signed by the same person by the same person, attaching a photocopy of a valid identity document.

Date // (dd/mm/yyyy)

Signature