

SUPPLIER CODE OF CONDUCT

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In the event of conflict between the Italian and the English version, the Italian version shall always prevail.

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1. INTRODUCTION AND OBJECTIVES

This Supplier Code of Conduct (below the “Code”) applies to the Economic Operators qualified on the Procurement Portal of Cassa Depositi e Prestiti S.p.A. (below also CDP) who will enter into a contract for the supply of goods, services or works to the latter.

1.1 SUSTAINABILITY FOR CDP

CDP recognises sustainability as a value that guides the definition of its own strategies and the direction of its operations and undertakes to ensure that all Companies subject to management and coordination by CDP pursuant to articles 2497 et seq. of the Italian Civil Code, incorporate environmental, social and governance principles into their own business and operating models in order to create long term value for the company as a whole and for the community in which it operates.

On 27 May 2021, the Shareholders’ Meeting introduced the principle of “sustainable development” in CDP’s Articles of Association, whereby, in carrying out its business, CDP shall pursue the objective of promoting long-term economic, social and environmental sustainability, taking into account the interests of shareholders and other key stakeholders, in order to achieve a dynamic balance between economic growth, social equity and environmental quality, and thus meet the needs of the present without compromising the ability of future generations to meet their own needs.

With this in mind, in its capacity as a National Promotional Institution, CDP is firmly committed, in the long-term, to promoting initiatives capable of driving a just transition towards a more inclusive, resilient and sustainable development model so as to generate positive social externalities and minimise environmental impacts, also through structured and transparent dialogue with its stakeholders.

In its procurement of goods and services, CDP pays specific attention to issues related to the prevention of crime, including corruption, the quality of materials and timeliness of services rendered, respect for human rights, environmental protection and the application of fair and economically sustainable contractual conditions.

CDP recognises the importance of ensuring a transparent procurement cycle and considering the social and environmental impacts for the protection of its stakeholders, and is committed to selecting suppliers (below “Suppliers” or also in the singular “Supplier”) and managing relations with them in accordance with criteria of transparency, fairness and impartiality, avoiding situations of conflict of interest, both actual and potential, in full compliance with the external and internal regulatory constraints.

In consideration of the above, CDP is adopting this Supplier Code of Conduct, acceptance of which is mandatory for suppliers in order to enter into relations with CDP.

1.2 Purpose

Through this Code of Conduct, CDP aims to engage its suppliers in promoting a socially, environmentally and economically sustainable procurement cycle. The Code describes the requirements and expectations that Suppliers are required to comply with as part of a process of continuous improvement of their performance and is applied alongside the applicable external and internal regulations, including the principles set out in CDP’s Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 and in the Code of Ethics of Cassa Depositi e Prestiti S.p.A. and the companies subject to its management and coordination (“Code of Ethics”).

1.3 Scope of application

The rigorous application of the highest principles of integrity, fairness, reliability and sustainability underpin CDP’s ability to create shared value and establish solid relationships of trust with its stakeholders.

The Company's reputation is the result of the continuous application of the above-mentioned principles in its business and operational processes. This is why we ask Suppliers to adopt the principles set out in this document and collaborate to find the best solutions at each stage of the procurement process.

This Code applies to any person, entity, company, partner and other entity supplying activities, goods or services to CDP, without limitation to the supplies relating to all classes of goods. In addition, all Suppliers are responsible for ensuring that their employees and any subcontracting parties are informed regarding the principles contained in this Code and that they, in turn, comply with its application. CDP also expects Suppliers to adopt the principles set out in this Code and apply them throughout their supply chain.

This Code must be endorsed and accepted by all those concerned upon the signing of new contracts or the updating of existing contracts.

CDP reserves the contractual right to carry out inspections of its suppliers, also with the aid of third-party entities, to monitor the implementation of the Code.

2. GENERAL PRINCIPLES AND CRITERIA

2.1 Ethics

Integrity

Suppliers are required to conduct their business in compliance with the generally recognised principles of ethics and integrity for their sphere of operations and to use organisational systems consistent with the principles set out in the Code of Ethics adopted by CDP, in order to maintain lasting, honest and transparent relations with CDP.

Fair competition

Suppliers are required to conduct their business activities in compliance with the rules of fair competition in accordance with the applicable regulations.

Reporting suspected irregularities

Suppliers agree to provide their employees with suitable means and tools, including electronic instruments, to report any suspected irregularities or potentially unlawful and/or illegal activities or conduct in the workplace. Any such reports must be considered strictly confidential and treated as such by the Suppliers, which also agree to protect the reporting employees from any form of retaliation.

2.2 Labour

Unlawful employment and child labour

Suppliers are required to ensure the maximum respect for people and to comply with applicable labour regulations, refraining from any form of unlawful, forced or child labour, in line with ILO Convention 138 on Minimum Age and ILO Convention 182 on the Elimination of the Worst Forms of Child Labour.

Freedom of workers – Freedom of association – Collective bargaining

Suppliers are required to guarantee their employees the right to freedom of association and the application of the collective bargaining for their industry sector, in accordance with applicable laws and regulations. Suppliers are also required not to use forced, bonded or coerced labour in any way or form.

Working conditions

Suppliers are required to ensure working conditions for their employees that are respectful of human dignity, in compliance with applicable industry sector regulations concerning, among other things, hours worked (or working hours), overtime, remuneration and social security contributions, leave, holidays and sickness. Suppliers are also required

to provide training opportunities for their employees and to provide a working environment that complies with the hygiene and safety requirements imposed by the applicable regulations.

Diversity and equal opportunity

The fair treatment of all employees must be one of the fundamental principles of Suppliers' business policies and decisions. Suppliers are therefore required to promote this, ensuring that there is no discrimination in the workplace in relation to ethnicity, religion, gender, age, nationality, disability, culture, gender identity and emotional/sexual orientation, trade union membership or any other criteria illegal under applicable law, in line with ILO Convention 111 on Discrimination. Suppliers are required to ensure that their employees are not subjected to any kind of harassment, promoting an inclusive and supportive working environment.

2.3 Quality, health, safety and environment

Quality

Suppliers are required to comply with the quality and safety standards and requirements of the applicable regulations, in addition to complying with the quality standards agreed upon at a contractual level in order to provide products and services that duly meet the demands and needs of the Company, also by adopting and implementing a Quality Management System in compliance with the international standard ISO 9001:2015 (or similar). In addition, Suppliers undertake to minimise non-compliances and potential complaints arising from their direct activities and those of their Suppliers and to pursue initiatives that contribute to the continuous improvement of production processes and quality performance.

Occupational health and safety

Suppliers agree to protect employees and contractors from risks in the workplace. Suppliers are therefore required to take all necessary precautionary measures to ensure the health and safety of their employees and contractors and to mitigate the risks they are exposed to in the workplace. Suppliers are also required to provide the necessary training and information to ensure that employees and contractors are aware of the risks associated with their work. Suppliers are also required to ensure compliance with all applicable occupational health and safety regulations and to ensure appropriate controls, occupational safety procedures, preventive maintenance and technical protective measures necessary to limit occupational health and safety risks.

Suppliers are required to manage risks and emergencies related to their business activities by promoting the implementation of detection systems, prevention and management practices, response procedures and appropriate training and education, in order to limit the exposure of their employees and contractors to possible risks.

Efficient use and conservation of resources

Suppliers are required to make responsible and efficient use of all resources involved in the production cycle, to use sustainable sources of supply and, where possible, to use energy from renewable sources.

Negative impacts on the environment and climate must be reduced or eliminated at source or through practices such as changing production and maintenance processes, as well as the replacement, conservation, recycling and reuse of materials.

Waste and emissions

All activities that have potential harmful effects on human health and/or the environment must be properly managed, measured, controlled and treated before any substance is released into the environment. Suppliers are therefore required to monitor and control the local impacts of their business activities for waste management, ensuring the recycling, recovery and/or reuse or disposal in suitable sites where possible. Suppliers are also required to set up systems to prevent or reduce emissions of greenhouse gases and discharges of pollutants (into the air, marine waters, surface waters and groundwater) in order to limit the environmental impact of their business activities.

2.4 Business management systems

Legal and other requirements

Suppliers are required to comply with all international/EU/national laws and regulations, applicable contractual agreements and generally recognised standards relating, in particular, to the principles set out in this Code.

Documentation

Suppliers are required to prepare and maintain suitable documentation to demonstrate the implementation of the principles and values set out in this Code of Conduct and to make such documentation available to CDP upon request.

Training and Awareness

Suppliers are required to put in place appropriate training measures to provide their managers, employees and contractors with an appropriate level of knowledge and understanding of the content of this Code of Conduct, the applicable laws and regulations, and the generally recognised standards.

Continuous improvement

Suppliers are required to continuously improve their performance in accordance with the principles of this Code of Conduct, taking all appropriate measures to that end.

3. DISSEMINATION OF THE CODE

CDP promotes the adoption of this document by all the companies subject to Management and Coordination pursuant to Article 2497 et. seq. of the Italian Civil Code, which will independently adopt this document by resolution of their management bodies, ensuring its prompt adoption by their respective subsidiaries.

This Supplier Code of Conduct is periodically reviewed when the national and international regulations, referred to herein, are subject to changes or court interpretations, or when the need arises.