



**SEFIN** s.p.a.

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# SUPPLIER CODE OF CONDUCT

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# 1. SUPPLIER CODE OF CONDUCT

*“We innovate responsibly, we grow successfully!”*

## 1.1 SUSTAINABILITY FOR THE SEFIN GROUP

The SEFIN Group (hereinafter also Sefin or the Company) recognises the crucial importance of sustainability in the development of strategies; therefore it is committed to operating in accordance with its Sustainability Policy, ensuring responsible and transparent behaviour to actively contribute to a more sustainable future, promoting practices that not only respect the environment, but also generate a positive impact on the community and the economy.

Since 2023, the Group has been preparing, in accordance with the relevant standards and regulations, its Social Report, to account for the social, environmental and economic impacts of its activities. In fact, this represents an accountability mechanism that goes beyond the traditional financial balance sheet, as it provides information on how an organization contributes to the well-being of the community and the environment.

The SEFIN Group is committed to ensuring that its procurement cycle is not only efficient, but also ethical and sustainable, recognizing the importance of having responsible suppliers. For this reason, Sefin has introduced a Code of Conduct for its Suppliers, which establishes clear criteria for the selection and management of business relationships.

This Code is based on the principles of transparency, fairness and impartiality, aiming to avoid conflicts of interest and to comply with internal policies and procedures. Suppliers must accept and comply with these regulations in order to have the opportunity to collaborate with the Sefin Group.

The Supplier Code of Conduct is in line with international standards, such as the “Ten Principles” of the United Nations Global Compact, the Universal Declaration of Human Rights and the main conventions of the International Labour Organization (ILO). In this way, the SEFIN Group reaffirms its commitment to responsible business practices, supporting respect for human rights and social and environmental well-being.

## 1.2 PURPOSE

SEFIN's Code of Conduct represents a commitment to the responsible and sustainable management of the supply chain; therefore, involving suppliers in this process is essential to ensure that business practices are aligned with ethical values and social, environmental and economic sustainability standards.

The Code applies in a complementary way to the laws and regulations in force in the various countries in which SEFIN operates, ensuring that all business activities comply with local and international legal requirements. In addition, it integrates the fundamental principles already outlined in its Code of Ethics, promoting responsible and transparent conduct that reflects the company's commitment to corporate social responsibility.

Through this collaborative approach, SEFIN aims not only to improve the sustainability profile of its supply chain, but also to raise awareness among suppliers on important ethical and environmental issues, creating long-term positive results.

## 1.3 SCOPE OF APPLICATION

This Code is intended as a fundamental reference document that applies to all suppliers, whether they are private individuals, entities, companies or partners, involved in the provision of activities, goods or services to the Company. Therefore, there are few limits to its application: any supplier, regardless of the product category, is subject to the provisions of this Code.

It is important to emphasize that each Supplier has the responsibility to ensure that its personnel, as well as any subcontractors, are adequately informed of the principles expressed in the Code and that they are committed to respecting those principles. This is crucial to ensure that all levels of the supply chain are aligned with the Company's ultimate ethical and operational expectations. In the event of the signing of new contracts or updates to existing ones, the sharing and acceptance of the Code become necessary conditions for all parties involved.

In addition, the Company reserves the right, in accordance with its contractual rights, to carry out inspections at suppliers' premises, also with the support of third parties. These controls aim to monitor the effective implementation and compliance with the Code, thus ensuring that the

established principles are respected throughout the supply chain. Such measures are not only part of the Company's normal business operations, but also represent a commitment to quality and integrity in business relationships.

Each Supplier is therefore invited to read the Code of Conduct carefully, to implement the relevant practices in their daily work, and to actively contribute to the promotion of responsible and sustainable business activity.

## **2. HUMAN RIGHTS**

### **2.1 PROTECTION OF THE PERSON**

Suppliers, as key players within the production chain, play a fundamental role not only in guaranteeing the quality of the goods and services offered, but also in promoting and protecting human rights, universally recognized, through the development of an inclusive culture within their organization that fosters diversity and ensures that each individual feels valued and has the opportunity to express their potential.

These rights are enshrined in the Universal Declaration of Human Rights adopted by the United Nations and the Declaration on Fundamental Principles and Rights at Work promoted by the International Labour Organization (ILO).

### **2.2 EQUALITY**

It is essential to promote an inclusive and respectful environment, where each individual can feel valued and accepted for who they are. Discrimination, in all its forms, is a serious violation of human rights and hinders social and cultural progress. It can manifest itself in different ways: for reasons of race or skin colour, for sex or gender identity, for the language spoken or the religion professed, and more. Everyone has the right to be treated with dignity, regardless of their social position, political opinions, nationality, age or state of health.

We want, here, to pay attention to compliance with regard to:

- Women's rights: It is crucial to promote a culture of respect and equality so that every individual, regardless of gender, can fulfil their potential.
- Minority rights such as the right to identity, which allows minorities to preserve and

develop their cultures, languages and religions; the right to participation, which ensures that they have the opportunity to become actively involved in different aspects of professional or public life; and the right to non-discrimination, to prevent them from suffering injustices based on ethnicity, religion or language

- Rights of indigenous peoples: which include safeguarding their culture, territory, self-determination and access to natural resources, as well as respect for their traditions and social practices.

## 2.3 HARASSMENT

The Supplier is actively committed to promoting a corporate culture characterized by mutual respect and the dignity of each individual. In this context, it is essential that the workplace is configured as a safe and welcoming space, free from all forms of harassment. This includes not only sexual harassment, but also intimidation and threats related to these unacceptable practices. It is imperative that staff feel free to speak out and report any inappropriate behaviour, without fear of retaliation or negative consequences. To this end, the Supplier will adopt clear policies and reporting procedures, ensure adequate training for all employees, and foster an environment in which everyone can work peacefully, thus helping to build a cohesive and productive team.

## 2.4 FIGHT AGAINST MODERN SLAVERY

The term “modern slavery” includes any form of exploitation such as non-compliance with the minimum requirements of collective labour agreements, slavery, servitude, forced or compulsory labour and trafficking in human beings. Sefin requires its suppliers to respect human rights and to ensure a working environment free from exploitation and coercion. It is the responsibility of each supplier to adopt practices that promote the well-being of workers, ensuring that no person is forced to work against their will and that no form of slavery or trafficking in human beings find space in their operations.

## 2.5 PRIVACY

Compliance with current data protection regulations is an absolute obligation for every provider. In particular, in Europe, the General Data Protection Regulation (GDPR) establishes clear and strict principles that aim to protect citizens’ rights regarding the processing of their personal information. It is, therefore, crucial that the supplier not only complies with these regulations, but



also implements appropriate security measures.

### **3. LABOUR PROTECTION**

#### **3.1 ETHICAL RECRUITMENT**

Ethical recruitment is an approach to recruiting that emphasizes fair, transparent, and respectful practices towards candidates. This type of recruitment aims to ensure that all people, regardless of personal characteristics such as ethnicity, gender, age, disability or sexual orientation, have equal opportunities and are evaluated on the basis of their skills and potential.

#### **3.2 WORKING CONDITIONS**

In a work context that is increasingly attentive to social responsibility and the well-being of employees, it is essential that the Supplier not only respects, but actively promotes, working conditions that enhance and protect human dignity. It is the responsibility of the Supplier to ensure that working conditions do not compromise the health of employees, not only by preventing injuries, but also by taking measures that ensure the psychological well-being of workers, reducing stress and promoting a culture of support and collaboration.

#### **3.3 WORKERS' FREEDOM | FREEDOM OF ASSOCIATION | COLLECTIVE BARGAINING**

The Supplier is responsible for creating a working environment that respects the fundamental rights of its employees. It is essential that workers have the freedom to join trade unions or professional associations, as provided for in the laws and regulations in force. This freedom not only allows employees to have a voice and be represented, but also fosters a climate of collaboration and dialogue between the parties, increasing the possibility of addressing and resolving work issues more effectively.

In addition, the value of collective bargaining must be recognized and supported. Through it, workers can negotiate working conditions, wages and other rights fairly, thus ensuring greater protection and dignity for all.

#### **3.4 COMPENSATION, BENEFITS AND WORKING HOURS**

The working hours of suppliers' employees must comply with the maximum limits established by

current legislation, and the minimum wage cannot be lower than that established for by collective agreements and legal regulations applicable in the various countries, and the benefits established by law must be guaranteed.

### **3.5 HEALTH AND SAFETY AT WORK**

The well-being of employees and collaborators is a fundamental priority for any supplier who operates responsibly. To ensure a safe working environment, the supplier must take a set of essential precautionary measures. These measures should include implementing safe operating practices, providing role-appropriate personal protective equipment, and creating work environments that minimize the risks associated with specific activities. It is essential that these measures are always updated and adapted to changing working conditions, so as to respond effectively to different safety obligations.

### **3.6 USE OF PRIVATE OR PUBLIC SECURITY FORCES**

Whenever third parties, whether public or private, are used to ensure the security of the supplier's operations and activities, it is crucial that the supplier ensures that its employees are adequately protected through appropriate instructions or supervision from these external entities. Security personnel are required to respect the human rights of the persons with whom they interact in the performance of their duties. The use of suffering, acts of cruelty, excessive use of force, inhuman or degrading treatment, as well as any form of violence that compromises the life or physical integrity of individuals, as well as the violation of the rights of organisation and freedom of association, is unacceptable.

### **3.7 IRREGULAR LABOUR AND CHILD LABOUR**

The supplier must ensure respect for human rights and current labour regulations, avoiding any form of exploitation. This implies the absolute prohibition of forced labour and child labour, in accordance with the provisions of ILO Conventions No. 138 and No. 182. It is essential that the supplier adopt labour practices that promote the dignity and well-being of workers, thereby contributing to a safe, fair, and respectful work environment for all.

## **4. QUALITY AND SAFETY**

### **4.1 QUALITY**

The Supplier is obliged to scrupulously comply with the rules and requirements established by the applicable reference legislation. This involves not only complying with specific laws and regulations, but also adopting operational practices that ensure quality and safety. It is essential that the Supplier also undertakes to comply with the quality standards agreed upon during the contract negotiations. The objective of these requirements is to ensure that the products and services provided are not only compliant with regulatory expectations, but are also capable of responding adequately to the needs and demands of the Company.

### **4.2 PRODUCT AND PROCESS SAFETY**

When it comes to hazardous substances, it is crucial to ensure that all necessary safety information is accessible and understandable. The Supplier is required to provide detailed and up-to-date safety data sheets, which contain essential data regarding the handling, storage and disposal of these substances. These documents must not only be comprehensive, but they must also clearly explain any risks, preventive measures, and procedures to be followed in case of emergencies. In addition, the Supplier is obliged to implement appropriate security programs to manage the production processes. This involves not only adopting safe working practices, but also adapting to the safety regulations in force in the sector.

### **4.3 PRIVACY AND DATA PROTECTION**

It is crucial to ensure the security of Sefin's confidential information within the suppliers' information systems. The latter must implement appropriate measures to protect the data against unauthorized access and use, as well as from undue disclosure, modification or destruction. It is essential that providers only collect personal information for legitimate purposes and that all use is done in a legal, transparent and secure manner. Sharing such data should only take place with authorized parties. In addition, it is mandatory to protect your information in accordance with current security regulations in place. Personal data must only be kept for as long as necessary, and providers must ensure that third parties involved in the processing of such data also comply

with the same protection measures. This approach helps to maintain high standards of security and trust.

## **4.4 EMERGENCY AND RISK MANAGEMENT**

The Supplier has the crucial responsibility to deal with the risks and emergencies related to its business activities in a proactive and systematic manner.

The Supplier must implement detection systems that allow potential threats to be constantly monitored. This involves an in-depth assessment of the risks associated with different business activities, identifying which aspects could result in emergency situations. Once identified, it is necessary to develop targeted prevention practices, which minimize the likelihood of such events occurring.

In addition, the Supplier must develop clear and easily implementable response procedures so that personnel can act quickly and competently in the event of an emergency. These procedures must be communicated transparently to all members of the organization, ensuring that everyone knows how to behave in critical situations.

## **5. ENVIRONMENT**

### **5.1 EFFICIENT USE AND CONSERVATION OF RESOURCES**

The Supplier has the fundamental obligation to responsibly and efficiently manage all the resources used in the production cycle, encouraging the adoption of sustainable sources of supply by pursuing the following objectives:

- Energy efficiency: Suppliers are committed to putting in place management systems aimed at continuously improving energy efficiency in their operations.
- Use of Renewable Energy
- Quality consumption and water management: Supplier must pay attention to water consumption, adopting sustainable practices and precautionary measures that promote conscious management of water resources.
- Improved air quality
- Soil quality/Biodiversity, land use and deforestation
- Animal welfare

- Responsible Chemical Management
- Decarbonization

## 5.2 CLIMATE PROTECTION

Suppliers shall integrate climate protection as a key element in their business strategy, including goals and values. They will need to analyse whether and how climate change affects their own operations and supply chains, making appropriate adjustments to address these challenges.

## 5.3 WASTE AND EMISSIONS

The responsible management of business activities is a topic of fundamental importance, especially when it comes to ensuring people's health and environmental protection. It is crucial that all operations that could have harmful effects are carefully monitored and managed with the utmost diligence. Before releasing any substance into the environment, it is essential to carry out rigorous measurements and controls to assess potential risks and prevent damage.

- Waste: The Supplier is responsible not only for complying with the regulations in force for the waste management, but also to actively engage in ensuring that waste is recycled, recovered or reused whenever possible. If this is not the case, it is essential that waste is disposed of at appropriate sites to avoid contamination and environmental damage.
- Greenhouse gas emissions: The Supplier must develop policies to mitigate greenhouse gas emissions, which are a major cause of climate change and global warming as they trap heat in the earth's atmosphere, causing average temperatures to rise.
- Noise emissions: The Supplier must undertake to reduce unwanted or disturbing sounds produced by various sources, such as vehicles, machinery, construction, industrial activities and others. Noise can have significant impacts on human health, well-being, and the environment, contributing to problems such as stress, sleep disorders, and reduced quality of life.

## 6. INTEGRITY, ETHICS AND ANTI-CORRUPTION

### 6.1 COMPLIANCE WITH THE LAW

Suppliers are obliged to comply with all relevant laws and regulations, both nationally and

internationally, that are in force in the countries in which they carry out their business activities. This implies constant adaptation to regulations that may concern aspects such as safety at work and environmental protection, workers' rights and fair business practices.

## **6.2 INTEGRITY**

The Supplier must ensure that its operations comply with the principles of ethics and integrity commonly accepted in the business environment. It is essential that it makes use of organizational systems that reflect the principles established in the Company's Code of Ethics. This compliance aims to promote and maintain long-lasting, honest and transparent relationships with the Company itself.

## **6.3 ANTI-CORRUPTION**

The Supplier must operate according to high standards of integrity and transparency. This commitment involves not only avoiding misbehaviour, but also fostering a culture of honesty and justice in business interactions.

The Supplier must oppose any form of corruption. This means that it can neither offer nor receive inappropriate benefits, whether material or intangible. Active corruption, i.e. corruption that manifests itself through proposals of benefits aimed at third parties to influence decisions, is unacceptable. Similarly, passive corruption, which occurs when the Supplier accepts such benefits, must also be strictly avoided.

In addition, the Supplier must carefully monitor any acts of extortion, which further undermine the reputation and stability of the companies involved. Potential attempts to exploit a party's position to gain benefits through coercion must be categorically rejected, in order to preserve a healthy and profitable work environment.

Finally, it is important to note that the Provider has no right to promise, offer or accept benefits that may be perceived as undue.

## **6.4 FAIR COMPETITION**

It is essential that the supplier, like any other player in the market, adopt behaviours that promote fair competition. This is not only an ethical principle, but also a legal obligation that results in

responsible and acceptable business practices.

To implement this principle, suppliers must avoid unfair practices, which often lead to distortions in the market and harm not only competitors, but also end consumers. An example of an unfair practice can be the falsification of products or the dissemination of misleading information. Similarly, non-discrimination against customers is crucial: every customer should have access to the same opportunities and conditions, without favouritism or unjustified obstacles.

Transparency of information is another key element in this context. Suppliers must provide clear and accurate data about their products and services, allowing consumers to make informed choices. In particular, the Supplier undertakes to comply with anti-trust legislation which, designed to prevent monopolistic and collusive behaviour, ensures that every company can compete without being subjected to pressure or retaliation.

## **6.5 CONFLICT OF INTEREST**

Transparency in the disclosure of conflicts of interest by suppliers is crucial for ensure the integrity of business relations. This commitment makes it possible to prevent situations in which personal interests can influence business decisions, compromise the fairness of transactions or damage the reputation of all parties involved. Timely information about significant benefits or ties with competing companies or related businesses ensures an ethical and responsible work environment. It also involves the creation of a monitoring and verification system, helping to build mutual trust.

## **6.6 PRIVACY AND INTELLECTUAL PROPERTY**

Protecting your privacy and intellectual property rights is crucial to ensuring a safe and respectful work environment. Suppliers are required to handle confidential information with the utmost care, ensuring that the privacy and rights of all employees and business partners are adequately protected. It is essential that sensitive data is not disclosed without authorization. In addition, suppliers may not use the name, trademarks or products of Sefin and its affiliates in advertising or dissemination materials unless they receive prior written consent from Sefin. The Provider shall refrain from using, reproducing or distributing, in general, works protected by copyrights, patents, trademarks and other forms of IP protection without the express permission of the rights holder.

## **6.7 FINANCIAL RESPONSIBILITY**

Each supplier is required to issue accurate and complete invoices, accompanied by all necessary documentation, and to refrain from conduct or omissions that may compromise the correct and complete keeping of accounting records by the Company. Suppliers must guarantee compliance with contractual obligations and the quality and quantity of products. Lack of adherence to these standards can compromise trust and business relationships.

## **6.8 INTERNATIONAL TRADE CONTROLS**

Suppliers are required to comply with all export control regulations relevant to their operations. This responsibility extends to ensuring that all goods and services offered are in line with national and international laws. It is crucial that suppliers provide accurate and truthful information regarding their shipments, destinations, and any applicable restrictions.

# **7. BUSINESS MANAGEMENT SYSTEMS**

## **7.1 LEGAL AND OTHER REQUIREMENTS**

The Supplier, assuming a fundamental role in the context of commercial relations, undertakes to ensure conduct in compliance with all laws and regulations currently in force. This commitment is not limited only to regulatory compliance, but also extends to the contractual agreements stipulated, underlining the importance of mutual trust between the parties involved..

## **7.2 DOCUMENTATION**

The proposed text clearly establishes an obligation for the Supplier regarding documentation relating to adherence to the principles and values set out in the Code of Conduct. The importance of having adequate and always up-to-date documentation is emphasized, which not only certifies compliance with these principles, but is also available to the company in case of need.

## **7.3 TRAINING AND EXPERTISE**

The Supplier is actively committed to training its managers, employees and collaborators in order to ensure that each individual understands not only the rules written in the Code of Conduct, but also the meaning and importance of each provision in daily practice. This includes a clear



understanding of relevant laws and regulations, which may vary by industry and jurisdiction, as well as compliance with generally recognized industry standards. In addition, employees and collaborators must be trained so that they are fully aware of the risks associated with their tasks because, only through adequate training, can workers learn how to recognize dangerous situations and how to behave in the event of an emergency. The information that the supplier must provide also concerns the correct use of equipment, emergency procedures and how to intervene in risk situations.

## **7.4 CONTINUOUS IMPROVEMENT**

The Supplier is obliged to engage in a process of continuous improvement of its performance, carefully following the principles of the Code of Conduct. This involves not only adhering to quality standards and regulations, but also taking proactive initiatives to optimize their processes and services. Transparency in operations and comparison with external feedback are essential to identify areas for development and ensure constant evolution.

## **8. WHISTLEBLOWING**

The Supplier, aware of the importance of maintaining a transparent and secure working environment, undertakes to provide its employees and collaborators with adequate means and tools, including in the IT field, to allow them to report any suspicious irregularities or conduct that may be illegal or illegal.

The Supplier must treat the report with the utmost seriousness and due confidentiality, guaranteeing that no employee will suffer retaliation of any kind for making a report in good faith. In addition to the above, if, at any time, a supplier or one of its employees believes that an employee of Sefin has acted contrary to the principles of this Code of Conduct, or believes that there is a risk of violation of these principles, the supplier or its employee is invited to report their concern to the following address: [direzione@sefin.it](mailto:direzione@sefin.it). Sefin guarantees that it will not retaliate against employees who expose a problem in good faith.

## **9. APPROVAL AND DISSEMINATION OF THE CODE**

The Board of Directors of SEFIN has approved the Code of Conduct for Suppliers and encourages all subsidiaries to adopt it. These companies can adopt the document autonomously through a decision of their management bodies, thus ensuring rapid implementation. In addition, the Code will undergo regular reviews to align with any changes in relevant national and international regulations, taking into account industry best practices.