



SAVINO DEL BENE®

Global Logistics and Forwarding Company

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SUPPLIER CODE OF CONDUCT

SAVINO DEL BENE GROUP



Index

Supplier Code of Conduct

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INTRODUCTION	3
1. Foreword	3
2. Values	4
3. The People	5
3.1 Knowledge and protection of professional capabilities and the role of diversities	5
3.2 Protection of health and safety in the workplace	7
3.3 Protection of the environment	7
4. Rules of conduct	7
4.1 Compliance with laws	7
4.2 Corruption	7
4.3 Money laundering and financing of terrorism	8
4.4 Competition	8
4.5 Conflicts of interest	8
4.6 Processing of personal data	9
4.7 Protection of material resources	9
5. Mechanism of implementation	9
5.1 Reports	9
5.2 Breaches	10
5.3 Amendments and updates	10



INTRODUCTION

1. Foreword

Savino Del Bene S.p.A. operates in the international multimodal transport industry and, in conducting its business, complies with all applicable laws and regulations in the countries in which it operates. Accordingly, Savino Del Bene S.p.A. conducts its activities in compliance with the principles of human dignity, freedom, and diversity, rejecting all forms of discrimination based on gender, race, language, personal and social condition, or religious and political beliefs. The Company seeks to pursue its growth by fostering an image grounded in the values of integrity and loyalty. It therefore believes that compliance with ethical principles and transparency in the conduct of its business is not only a necessary condition, but also a competitive advantage in pursuing and achieving its objectives. To this end, Savino Del Bene S.p.A. promotes the creation of an environment characterized by a strong sense of ethical integrity, firmly believing that this contributes decisively to the effectiveness of its control policies and systems. The Company has adopted a general Code of Ethics setting out the rules of conduct governing the behavior of company representatives in the establishment and management of relationships with the various public and private stakeholders with whom the Company may interact, including public authorities, suppliers, customers, competitors, the wider community, shareholders and corporate bodies, institutions and associations, and political parties. With specific reference to suppliers, the Code of Ethics sets out guidelines governing relations with suppliers, the criteria for the selection and management of suppliers of goods and services, the conclusion of supply agreements, the engagement of consultancy firms and external professional advisors, partnerships, and relationships with correspondents.

Based on the principles already set out in its Code of Ethics and Anti-Corruption Guidelines, and with the aim of ensuring greater involvement of its supply chain in sharing the principles and rights upon which the Company is founded, Savino Del Bene S.p.A. has prepared this document, entitled the "Supplier Code of Ethics" (or simply the "Code"). The Code defines the conduct and rules with which suppliers are required to comply, with a view to the continuous improvement of their activities, including through the adoption and development of innovative digital technologies. The Company establishes relationships with suppliers of proven professionalism, capable of operating in accordance with the highest quality standards, who not only share the principles set out in the Code but also promote their adoption among their own personnel and throughout their respective supply chains. The selection of reliable partners is an essential activity for the creation of value for the Company's stakeholders, ensuring innovation and continuous improvement while safeguarding the integrity and reputation of Savino Del Bene S.p.A. in the marketplace.

The requirements of this document do not replace the requirements and legal provisions and the contractual commitments accepted by the suppliers with Savino Del Bene but rather are an addition to them.

This document is intended to form an integral part of the Organizational Model adopted by the Company pursuant to Italian Legislative Decree No. 231/2001 (the "Model 231") for the prevention of the offenses contemplated therein.



The Supplier Code of Ethics has been adopted by the Board of Directors of Savino Del Bene S.p.A. and may be amended at any time. In particular, any changes that may be required as a result of the Company's exposure to new or additional risks within its supply chain shall be submitted for approval to the Board of Directors. Amendments introduced solely to implement organizational changes and/or procedural adjustments shall not be considered substantive amendments and, as such, shall not be subject to approval by the Board of Directors.

2. Values

The values forming the "**inalienable reference points**" of the organisation are:

- **Legality**, intended as compliance with the law, regulations and statutory provisions;
- **Personal integrity**, intended as loyalty, consistency, propriety, reliability, confidentiality and compliance with the rules;
- **Transparency**, understood as attention to the needs and expectations of stakeholders. Continuous dialogue with the Company's stakeholders and the provision of clear, complete, and truthful information are considered essential, in the awareness that the sharing of objectives and results is necessary to maximize value and reduce corporate risks;
- **Collaboration**, understood as both the development of individual capabilities and the sharing of departmental results as Company-wide results, and as a cornerstone for building strong and long-lasting relationships through which the Company's objectives are achieved;
- **Enthusiasm**, meaning the willingness to act promptly and with dedication, together with the desire to succeed and to rise to increasingly ambitious and challenging objectives;
- **Organisation**, understood as a rational approach to problems, coupled with the ability to plan work effectively and evaluate suggestions and opportunities for improvement;
- **Protection and support of human rights**, as a cornerstone for the creation of a society based on the principles of equality and solidarity;
- **Guarantee of equal opportunities**, ensuring non-discrimination on the basis of age, gender, health status, race, nationality, political opinions, or religious beliefs;
- **Innovation**, intended as the commitment to acquire state-of-the-art technological skills to develop innovative ideas, make everyday activities more efficient and contribute to progress of a civil society in terms of greater safety and a lower environmental impact.

The Company also expects its suppliers to act in a socially responsible manner and to implement appropriate ethical programs aligned with the Group's principles and standards of conduct.



3. The People

3.1 Knowledge and protection of professional capabilities and the role of diversities

Through recognition and protection of the value of its people, the Savino Del Bene Group promotes the creation of a responsible workplace, in which diversity is acknowledged and individual professional capabilities are nurtured.

By voluntarily adhering to the International Labour Organization (ILO) programs, the Company has embraced the principles and rights set forth in the ILO Constitution and the Declaration of Philadelphia, and undertakes to operate in full commitment to achieve the objectives of the Organization to the best of its abilities. These principles and rights are expressed and developed through specific rights and obligations enshrined in the Conventions recognized as **fundamental**, both within and outside the Organization. The nine fundamental Conventions are:

- Forced Labour (Convention No. 29);
- Freedom of association and protection of the right to organise (Convention No. 87);
- Right to organise and collective bargaining (Convention No. 98);
- Equal remuneration, abolition of forced labour (Convention No. 100);
- Discrimination, employment and occupation (Convention No. 105);
- Minimum age (Convention No. 111);
- Worst forms of child labour (Convention No. 138);
- Violence and harassment in the workplace (Convention No. 182).

Therefore, in accordance with the provisions of the ILO Declaration on Fundamental Principles and Rights at Work and the relevant Conventions, and in order to prevent and/or avoid their activities from causing or contributing to violations of human rights, suppliers are required to:

✓ **Prohibit any form of forced or compulsory labour**, understood as any work or service extorted from a person under threat of punishment or performed without the individual's voluntary consent, and ensure that such labour is not used in any of the following forms:

- Coercion or political indoctrination, or as a sanction against people who have either expressed certain political opinions or manifested their ideological opposition to the existing political, social and economic order;
- A method of mobilisation or use of labour for purposes of economic development;
- A disciplinary measure in the workplace;
- Punishment for participating in strikes;
- A measure of racial, social, national or religious discrimination.



✓ **Guarantee the right of all workers**, without distinction and without any prior authorisation, to create organisations of their choice and to become members of them, under the sole condition of complying with their charters. To this end, the term "**Organisation**" means any organisation of workers or employers with the purpose of promoting and defending the interests of workers or employers;

✓ **Guarantee all workers the free exercising of the trade union rights;**

✓ **Ensure that workers benefit from adequate protection** against all acts of discrimination aimed at undermining their freedom to organise in employment. This means that:

- employment of a worker is not conditional upon them not joining a trade union or leaving one;
- a worker is not dismissed or otherwise prejudiced due to their trade union membership or their participation in trade union activities outside working hours or, with the consent of the employer, during working hours.

✓ **Ensure application of the principle of equal remuneration for men and women workers for work of equal value.** In this regard, it is specified that the term "remuneration" refers to the ordinary, basic, or minimum wage or salary, as well as any additional emoluments whatsoever payable directly or indirectly, whether in cash or in kind, by the employer to the worker and arising from the worker's employment. The term "equal remuneration for male and female workers for work of equal value" refers to rates of remuneration established without discrimination on the basis of sex.

✓ **Promote**, using methods appropriate to the circumstances and national customs, **equality of opportunity or treatment in employment or occupation**, in order to eliminate any discrimination. It is specified that the term "discrimination" includes any distinction, exclusion, or preference based on race, color, sex, religion, political opinion, national extraction, or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.

✓ **Prevent any form of child labour** ensure compliance with local laws prohibiting the employment of adolescents under 18 years of age in hazardous work;

✓ **Prevent the worst forms of child labour**, defined as follows:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour;
- The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs, as defined in the relevant international treaties;
- Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.



3.2 Protection of health and safety in the workplace

In order to guarantee the health and safety of all workers, suppliers are required to conduct a thorough analysis to identify and assess risks, and to develop preventive control measures that ensure reasonable certainty that no negligent or malicious actions occur that could cause direct or indirect harm to people or to the tangible and intangible resources of the company, including through the use of state-of-the-art protection technologies and practices. Suppliers' top management is therefore required to demonstrate a strong commitment to workplace health and safety by promptly implementing training programs and raising workers' awareness of appropriate conduct. Suppliers are also required to report any situation that could constitute a significant hazard and to consistently operate with a view to continual improvement, cooperating with the Savino Del Bene Group in programs for monitoring and controlling specific indicators, as well as in the implementation of appropriate working practices.

3.3 Protection of the environment

Suppliers are required to operate in a sustainable manner, minimizing environmental impacts and ensuring the optimal use of energy and natural resources. They must also conduct their activities responsibly, avoiding actions that compromise the needs of future generations, and undertake to identify and assess environmental risks, contributing to the goals of efficient operations and the reduction of direct emissions.

The environmental aspects associated with their activities must be clearly identified, managed, and monitored in accordance with universally recognized environmental management standards.

Suppliers are also expected to promote environmental sustainability principles throughout their entire supply chain, encouraging responsible practices in energy use, raw material consumption, land management, atmospheric emissions, water use, and the recycling and/or proper disposal of waste.

4. Rules of conduct

4.1 Compliance with laws

Suppliers are required, including through the adoption of a Code of Ethics (or an equivalent instrument, regardless of its name) distributed to all personnel within their organization, to comply with applicable laws and regulations in the countries where they operate, including those relating to safety and the environment, and to actively seek solutions that promote energy savings and reduce waste and the use of hazardous substances. Suppliers must also develop procedures to govern the transport, storage, treatment, and safe, environmentally responsible disposal of waste.

4.2 Corruption

Suppliers are required to:



- ✓ Refrain from offering, promising, giving, paying, or authorizing anyone to give or pay, directly or indirectly, material, financial, or other benefits to a public official or private individual (active corruption);
- ✓ Refrain from accepting, or authorizing anyone to accept, requests or demands, directly or indirectly, for financial or other benefits from a public official or private individual (passive corruption), when the intention is to:
 - Induce a public official or private individual to perform a public function or engage in business-related activities improperly, and to reward them for doing so;
 - Influence any public act or omission by a public official, or any decision in breach of a public duty;
 - Obtain or secure an illegal advantage in conducting business;
 - Violate applicable laws, in any circumstance.

Suppliers are also required not to make Facilitation Payments, meaning unofficial payments made to public officials to hasten, favor, or otherwise facilitate the performance of routine activities.

Suppliers further acknowledge that any remuneration paid by the company must be linked exclusively to the services specified in the contract, and that payments shall be made only to the contractual counterparty, either in the country where the parties are incorporated or in the country where the contract is performed.

4.3 Money laundering and financing of terrorism

Suppliers are required not to encourage or tolerate, in any form, violations of human rights or any other illegal activities, including money laundering and the financing of terrorism.

4.4 Competition

Suppliers are required to refrain from any form of anti-competitive behavior and from any misleading or illegal practices, including, but not limited to, colluding with competitors to fix prices, rig competitive bidding processes, allocate customers, limit the supply of services, or make false or misleading claims regarding the products they manufacture and/or the services they provide.

4.5 Conflicts of interest

With regard to this subject, the company requires its suppliers to:

- ✓ Avoid any practice that could lead to committing or participating in fraud;
- ✓ Refrain from seeking improper advantages or attempting to influence company representatives in reaching impartial and objective decisions that are in line with company strategies;
- ✓ Avoid interfering in any company decision relating to qualification procedures and awarding of contracts, including requests for confidential information or communications outside the official institutional channels;



- ✓ Interact directly with the company, avoiding the use of intermediaries, and in any case, inform the company—before starting any relationship—of the existence of such situations, regardless of whether they are considered occasional or continuous given the characteristics of the supplier's operations.;
- ✓ Provide the company with all information necessary for the proper execution of the procurement process, including details on the corporate structure and control chain; specify in the bids the actual operational capabilities required to perform the assignment; and refrain from providing false or misleading information or omitting material information that could influence the company's decisions regarding supplier qualification and awarding of the contract;
- ✓ Promptly report any situation that is or could appear to be in conflict with the interests of the company. This includes cases where the supplier is, or should reasonably be, aware that a company employee has a direct or indirect financial, economic, or personal interest in the business, in the company, or in the corporate control chain of the supplier.

4.6 Processing of personal data

Suppliers are required to:

- ✓ Ensure the protection of both their own and third-party personal data by adopting appropriate procedures, implementing necessary security measures, training authorized personnel, and designating, in compliance with regulations, company functions responsible for privacy-related roles;
- ✓ Refrain from disclosing or using confidential information or trade secrets, directly or indirectly, for their own or others' benefit, unless expressly authorized by Savino Del Bene S.p.A.;
- ✓ Exercise all necessary precautions when processing, discussing, or transmitting sensitive or confidential information that could harm Savino Del Bene S.p.A., its employees, or its customers.

4.7 Protection of material resources

Suppliers are required to:

- ✓ Guarantee the security of information, based on its importance and, where necessary, perform a detailed analysis and assessment of the risk;
- ✓ Ensure proper use of computer systems, particularly when transmitting documents to Savino Del Bene S.p.A., and prevent the commission of offenses outlined in Italian Legislative Decree No. 231/2001 through their use.

5. Mechanism of implementation

5.1 Reports

Savino Del Bene provides company representatives and suppliers with channels to report any potential violations of their rights, applicable laws and regulations, or the company's Code of



Ethics. Reports can be submitted confidentially and anonymously, with a strict prohibition on retaliation against the reporter. The main reporting channels are:

Savino Del Bene website: <https://www.savinodelbene.com>

Ordinary mail: Savino Del Bene Spa, QHSE Office, Via del Botteghino 24/26 Scandicci (Florence)

5.2 Breaches

Savino Del Bene and its Group companies reserve the right to audit suppliers' compliance with this Code, either through requests for documentation or on-site audits, conducted directly or indirectly via professional advisors and/or consultancy firms appointed for this purpose.

Failure to comply with any clause of this Code may result in a lower rating on the company's qualified supplier list and/or termination of the working relationship with Savino Del Bene and/or other Group companies, depending on the nature and seriousness of the breach. In evaluating such breaches, the company will consider its internal procedures, agreements and/or contracts with suppliers, and applicable laws and regulations.

It should be noted that, as the company has adopted the Organisational Model pursuant to Italian Legislative Decree No. 231/2001, an ad hoc protocol establishing the disciplinary system for breaches of the Model has been included as an integral part of it. This disciplinary system also applies to the company's suppliers.

5.3 Amendments and updates

Savino Del Bene S.p.A. undertakes to ensure that the rules contained in this document are adequately communicated to all suppliers, including by publishing it on the company website where appropriate.

The company will also inform suppliers of any updates or additions to this document, including those arising from regulatory changes.