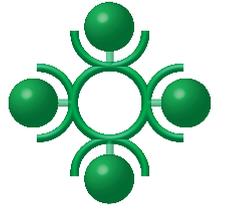


SINERGIA



# SUPPLIER CODE OF CONDUCT





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# INTRODUCTION

## Purpose and field of application

This **Code of Conduct** applies to all **Suppliers of Sinergia** and is an integral, substantial and essential part of the contractual obligations signed with Sinergia.

The behavior of all Suppliers must be in line with what is contained in the Code of Conduct and Sinergia reserves the right to take appropriate measures in case of non-compliance.

This Code of Conduct is structured around three fundamental key points:

### A. **Transparency and legality**

### B. **People**

### C. **Sustainability and safety**

## A. TRASPARENCY and LEGALITY

### A.1 **Legality and integrity**

For Sinergia **the compliance with the laws and regulations** in force in the countries in which it operates is essential. It believes that lawful and honest behavior is the foundation for lasting success, built on the trust of customers, investors, colleagues and communities.

**All Suppliers must comply with these principles** as Sinergia does not maintain relationships with those who do not share and implement them. Therefore, each Supplier has a fundamental role in knowing and respecting the laws in force which constitute the binding framework of the Company activities at an international level.

In no case can the pursuit of the Company's interests or the obtaining of an advantage for the same justify a conduct that is illicit or contrary to the principles of correctness, good faith, honesty and legality and to the principles indicated in this Code of Conduct.

### A.2 **Transparency**

**Clear, complete, timely and truthful information must be guaranteed in all relationships** (*work, commercial, institutional, etc.*) held with Sinergia or on its behalf. Sinergia cooperates actively and without reservations with all the Authorities with which it maintains relationships of any nature and expects the same from each Supplier. **The dissemination of false information is strictly prohibited.** Sinergia guarantees the truthfulness of its communications and the transparency of the conducted activities, without violating the confidentiality obligations required by company management rules.

### A.3 Conflict of interest

The following are considered as conflict of interest:

- Pursuance of personal or third-party interests other than those of Sinergia;
- Absence or lack of independence and objectivity of judgment due to activities carried out by the person who operates and takes decisions on behalf of the Company;
- Possibility of obtaining personal benefits from Sinergia's business opportunities.

**Any potential situation of conflict of interest must be reported** in the manner indicated in this Code of Conduct

### A.4 Fair competition

Sinergia is aware that a healthy and correct competition system contributes to continuous improvement and development.

For this reason, it demands that all **Suppliers comply with current competition regulations, collaborate with the market regulatory authorities and refrain from engaging in behavior that could constitute forms of unfair competition.**

No Supplier must be involved in initiatives or contacts with competitors aimed at unfairly impacting the market.

### A.5 Corruption

**Sinergia fights all forms of corruption without any exceptions.**

Suppliers are required to operate in a transparent and lawful manner, refraining from offering, promising, giving or paying, directly or indirectly, material or economic advantages to anyone, be they private individuals or representatives of Public Administrations.

They must also refrain from accepting offers or authorizing requests for material or economic advantages, direct or indirect.

**Suppliers are required to report any cases of possible corruption.**

### A.6 Intellectual property

Suppliers are required to maintain **maximum confidentiality regarding the information acquired** during the relationship with Sinergia. This means that **they must not to reveal to third parties information regarding the technical, technological and commercial knowledge acquired**, except in the cases provided for by law.

All Suppliers must act in compliance with existing regulations and rights regarding intellectual property, recognizing and respecting the intellectual property rights of Sinergia and third parties.



## B. PEOPLE

### B.1 Working conditions

Sinergia requires its Suppliers that all people involved, directly or indirectly, in activities that concern it are treated with dignity and respect and without any form of discrimination.

For no reason can child, forced or compulsory labor and management of working hours that do not comply with current legislation be tolerated.

Suppliers must guarantee to all people directly or indirectly involved the right to work, freedom of association and the right to collective bargaining, fair compensation and benefits compliant with applicable law, disciplinary practices in line with the provisions of the law. In any case, corporal punishment, physical or mental coercion or abuse of any kind are not tolerated.

All Suppliers must carry out their activities respecting the environment and in a responsible manner, also guaranteeing all workers a healthy and safe working environment.

### B.2 Diversity

Sinergia recognizes the positive value of diversity and promotes the principle according to which all people must have equal access to work regardless of personal characteristics and conditions that are not linked to performance, competence, knowledge or qualification.

For this reason it does not resort to any form of discrimination in the working life of its collaborators (*hiring, remuneration, access to training, promotion, termination of the working relationship*) based on gender, race, religion, creed, ethnic origin, nationality, caste, marital status, family responsibilities, political opinions, disability, sexual orientation or any other personal characteristic and/or condition.

All Suppliers must recognize, apply and guarantee the same values, operating in full compliance with them.

### B.3 Equal opportunity

Suppliers must offer the same job opportunities to their employees, collaborators and to those who apply to be part of them and must ensure a system of selection, management, remuneration and development of personnel based exclusively on criteria of merit and free of discrimination due to sex or any other personal characteristic, choice and/or condition.

### B.4 Personal data

The Suppliers undertake to collect and process personal data in compliance with the law and the principles of lawfulness, correctness, transparency, minimization, accuracy, updating, integrity and confidentiality.



## C. SUSTAINABILITY and SAFETY

### C.1 Sustainability

Sinergia asks its Suppliers to actively pursue and make their own the objectives set by the Paris Agreement (*COP21*) and the UNO Agenda of 2030, also through the design and development of corporate strategies inspired by them, creating shared values that allow a path of growth and continuous improvement to the Company and to anyone who encounters it.

### C.2 Workplace health and safety

Suppliers must protect individual and collective health and safety by:

- Providing suitable prevention and protection tools from any malicious or negligent behavior that could cause damage to people and/or company assets;
- Putting into practice correct and certified company organization;
- Using suitable technologies;
- Conducting awareness-raising activities through training and specific communications.

The Supplier is required to undertake to avoid engaging in illegal or dangerous behavior and to report any potentially dangerous situation.

### C.3

### Environment

Sinergia places protection and respect for the environment at the center of its strategies and choices and asks its Suppliers to do the same.

For this reason the Supplier is asked to promote sustainable and responsible industrial development, operate in full compliance with current national and supranational regulations and ensure the adoption of all measures and technologies capable of guaranteeing the minimization of environmental impact, the maximum energy efficiency, the careful management of natural resources, the reduction and recovery of waste and the containment of polluting emissions.

### C.4

### Safety and sustainability of products

The components and raw materials used and supplied by the Suppliers must be in line with the most advanced technological, production and environmental practices, with the greatest possible respect for the environment and the highest safety standards. Furthermore, Suppliers must guarantee high standards of safety and environmental respect even during on-site installation and operation, also considering the protection of third parties who will then actually have to operate on the Products.



# DIFFUSION and APPLICATION

## Updates and diffusion

This Code of Conduct is subject to periodic updates.



The latest version is always available on the following website:  
[www.sinergia-it.com](http://www.sinergia-it.com)

## Communications

Suppliers can report or make suggestions to



Sinergia S.p.A. through the channels indicated on its website:  
<https://www.sinergia-it.com/whistleblowing/>.

## Monitoring

At any time and in the manner it deems appropriate, Sinergia reserves the right to verify the adherence of its Suppliers to this Code of Conduct.

Failure to comply with the same may affect the qualification as Supplier of Sinergia, up to and including the interruption of relations depending on the severity of the violations, in accordance with internal procedures and legal requirements.

### ***Supplier Declaration***

*The Supplier declares to have read the contents of this Code of Conduct and to share them, undertaking to implement them as an integral part of the contractual conditions signed with Sinergia.*

*The Supplier declares to accept the qualification process, including the request for documentation and any audits by Sinergia.*

*The Supplier also undertakes to promote compliance with the Supplier Code of Conduct by its supply chain.*



**Sinergia S.p.A.**

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