



Company Directive

DA42008

SUPPLIER CODE OF CONDUCT

"We strive to make responsible behavior a contributing factor to our competitiveness and continuous improvement, and therefore to our success."

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1 SUSTAINABILITY FOR SINA

SINA S.p.A. is aware of the importance that sustainability has in defining the strategies of governments and companies, and undertakes to conduct its business, in line with its *sustainability policy*, in a responsible and transparent manner, integrating sustainability issues within its business strategy.

The Group, to which SINA S.p.A. belongs, implemented actions and concrete results as part of the sustainability commitments it pledged in its *sustainability plan 2017-2021, Going Global Sustainably*.

Since 2016, the Group has prepared the *Sustainability Report*, in compliance with the relevant standards and regulations, a fundamental tool for reporting on its non-financial performance.

Within the scope of its activities, SINA S.p.A. pays specific attention to issues related to the anti-corruption, the quality of materials and the timeliness of services rendered, the respect for human rights and the application of fair and economically sustainable contractual conditions.

SINA S.p.A. recognizes the importance of guaranteeing a transparent supply chain and of governing its own social and environmental impact in order to protect its stakeholders.

To this end, it undertakes to select Suppliers and manage relations with them according to the criteria of transparency, fairness and impartiality, avoiding situations of conflict of interest, even if only potential, in full compliance with the relevant company organizational procedures. With this in mind, in order to ensure that the principles enshrined in the selection and assessment criteria of its Suppliers, SINA S.p.A. has issued this *Supplier Code of Conduct*, which Suppliers must accept in order to entertain commercial relations with SINA S.p.A..

This document reinforces SINA S.p.A. 's commitment to the application of international standards, such as the *ten principles* of the United Nations Global Compact (UNGC), the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization (ILO) ¹.

2 PURPOSE

Through this *Supplier Code of Conduct*, SINA S.p.A. aims to involve its Suppliers in the construction of a sustainable supply cycle in terms of society, environment and economy.

The aforementioned code applies in conjunction with all the regulations in force in the countries in which the Company operates and is supplementary to all the principles set out in the adopted code of ethics and conduct and in the company procedures in force.

3 SCOPE AND APPLICATION

This document applies to any person, entity, company, partner and other party (hereinafter "Supplier") supplying any activity, good or service to SINA S.p.A.

For this reason, the *Supplier Code of Conduct* applies without limitation to Suppliers across all of the Company's product classes.

¹ For further information, please refer to the code of ethics, sustainability policy and sustainability plan 2017-2021 available on the company's website www.sinaing.it.

In addition, each Supplier shall be responsible for ensuring that its employees and any subcontracting parties are informed of and comply with the principles set forth in this document.

If new contracts are signed or existing contracts are updated, this *Supplier Code of Conduct* must be shared and accepted by all parties involved.

SINA S.p.A. reserves the contractual right to carry out inspections at its Suppliers' premises, also with the support of third parties, to monitor implementation of the code.

4 GENERAL ASPECTS

SINA S.p.A. carries out its business activities in compliance with national and international laws, with the regulations in force and with the principles defined in the Code of Ethics and in the sustainability policy.

SINA S.p.A. therefore undertakes to implement all the necessary measures to prevent and avoid corruption and conflicts of interest.

SINA S.p.A. requires that all its Suppliers (hereinafter also referred to as "Suppliers" or, singularly, the "Supplier") and Sub-Suppliers, in turn, undertake to share the principles of this *Code of Conduct*; compliance with said Code constitutes an important component of the Supplier selection and evaluation process. Moreover, SINA S.p.A. expects its Suppliers to adopt the principles of conduct contained in this *Code of Conduct*, applying them throughout their supply chain.

5 PRINCIPLES

5.1 Ethics

5.1.1 Integrity

The Supplier is required to conduct its business in compliance with the generally recognized principles of ethics and integrity and to use organizational systems consistent with the principles outlined in the Code of Ethics adopted by SINA S.p.A., in order to maintain lasting, honest and transparent relations with SINA S.p.A.

5.1.2 Anti-corruption

The Supplier is required to refrain from any form of active or passive corruption and/or extortion and not to promise, offer or accept undue and/or improper benefits of any kind, in pursuit of corrupt aims.

5.1.3 Fair Competition

The Supplier shall conduct its business in accordance with the rules of fair competition in compliance with the relevant legislation.

5.1.4 Privacy

The Supplier is obliged to comply with applicable regulations regarding data protection, adopting the appropriate security tools to preserve the confidentiality of the information which it processes in the context of its business, ensuring also that all its employees and collaborators comply with these guidelines.

5.1.5 Reporting suspected non-compliance

The Supplier undertakes to provide its employees with suitable means and tools, including digital methods, to report any suspected non-compliance or potentially illegal activities or behavior in the workplace.

Any such report shall be considered strictly confidential and treated as such by the Supplier, who also undertakes to protect the reporting parties from any form of retaliation.

5.2 Work

5.2.1 Illegal and child labor

The Supplier shall uphold the utmost respect for people and comply with applicable labor laws, refraining from any form of illegal, forced or child labor, in line with ILO Convention No. 138 on Minimum Age and ILO Convention No. 182 on the Elimination of the Worst Forms of Child Labor.

5.2.2 Freedom of workers, freedom of association, collective bargaining

The Supplier shall guarantee its employees the right to freedom of association and the application of collective bargaining for the relevant sector, in accordance with all applicable laws and regulations.

The Supplier agrees not to use forced, bonded or coerced labor in any way or form.

5.2.3 Working conditions

The Supplier is obliged to ensure that its employees work in conditions that respect human dignity, in compliance with current industry regulations regarding hours worked (or working schedules), overtime, pay and social security contributions, leave, vacations and sickness.

The Supplier also undertakes to provide training and educational opportunities for its employees and to ensure a working environment that complies with the health and safety requirements imposed by current legislation.

5.2.4 Diversity and Equal Opportunities

Fair treatment of all employees must be a fundamental principle of the Supplier's business policy and decisions.

The Supplier shall therefore promote this by ensuring that no discrimination occurs in the workplace on the basis of gender, race, religion, age, disability, sexual orientation, nationality, social origin, trade union membership or any other unlawful criterion under applicable law, in line with ILO Convention No. 111 on Discrimination.

The Supplier shall ensure that its employees do not suffer harassment of any kind and shall foster an inclusive and supportive work environment.

5.3 Quality, environment, health and safety

5.3.1 Occupational Health and Safety

The Supplier agrees to protect employees and contractors from workplace hazards.

The Supplier is therefore required to take all necessary precautionary measures to ensure the health and safety of employees and contractors and mitigate the risks to which they are exposed in the workplace.

The Supplier shall also provide training and information so that employees and collaborators are aware of the risks associated with their duties.

The Supplier shall also ensure compliance with all applicable occupational health and safety rules and regulations and provide appropriate controls, safe work procedures,

preventive maintenance and technical protective measures necessary to limit health and safety risks in the workplace.

5.3.2 Quality

The Supplier is required to comply with the standard rules and quality and safety requirements of the applicable reference legislation, as well as to comply with the quality standards agreed upon in the contract in order to provide products and services that adequately meet the demands and needs of the Company.

5.3.3 Emergency and risk management

The Supplier is required to manage risks and emergencies related to its business activities by encouraging the implementation of identification systems, prevention and management practices, response procedures and adequate training and information, in order to limit the exposure of its employees and collaborators to possible risks.

5.3.4 Efficient use and conservation of resources and climate protection

The Supplier is required to use all resources involved in the production cycle in a responsible and efficient manner, to use sustainable supply sources and, where possible, to use energy from renewable sources.

Negative impacts on the environment and climate must be reduced or eliminated at the source or through practices such as modifying manufacturing and maintenance processes, and replacing, preserving, recycling, and reusing materials.

5.3.5 Waste and Emissions

All activities that have potential adverse effects on the health of people and, or the environment must be properly managed, measured, controlled, and treated prior to the release of any substance into the environment.

The Supplier is therefore obliged to monitor and control the impacts produced by its business activities in the relevant country and to comply with regulatory requirements both for waste management, ensuring where possible the recycling, recovery and, or reuse or disposal in suitable sites, as well as for water consumption, adopting preventive measures aimed at conscious management of this resource.

The Supplier also undertakes to set up systems to prevent or reduce greenhouse gas emissions and, or discharges of pollutants into the air and marine, surface and ground waters in order to limit the environmental impact of its business activities.

5.3.6 Product and Process Safety

For hazardous substances, the Supplier shall provide material safety data sheets containing all necessary and relevant safety information.

The Supplier is required to adopt safety programs to manage and maintain all manufacturing processes in compliance with applicable safety standards and to address product issues and their potential impact during all phases of the manufacturing process.

5.4 Business management systems

5.4.1 Legal and other requirements

The Supplier agrees to comply with all applicable laws, regulations, contractual agreements and generally accepted standards.

5.4.2 Documentation

The Supplier is required to prepare and keep updated the appropriate documentation to demonstrate the implementation of the principles and values expressed in this Code of Conduct and to make this documentation available to SINA S.p.A. on request.

5.4.3 Training and expertise

The Supplier shall implement appropriate training measures to provide its managers, employees and collaborators with an adequate level of knowledge and understanding of the content of this Code of Conduct, of the applicable laws and regulations and of the generally recognized standards.

5.4.4 Continuous Improvement

The Supplier shall continuously improve its performance in accordance with the principles of this Code of Conduct and shall take all appropriate measures to that end.

6 APPROVAL AND DISSEMINATION OF THE CODE

SINA S.p.A. has approved by resolution of the Board of Directors on November 7, 2018 this *Supplier Code of Conduct* and shall promote its adoption by all its employees and ensure its timely adoption.

SINA S.p.A. Shall endeavor to encourage companies in which it has a non-controlling interest (including joint ventures) to adopt this *Supplier Code of Conduct*.

This *Supplier Code of Conduct* is subject to periodic review whenever national and international regulations, to which reference is made as *best practices*, are amended or differently interpreted by courts or whenever the need arises.