

# Supplier Code of Conduct

2025 edition

# Foreword



SACMI considers quality, sustainability and safety to be key elements of its strategy. It is also aware that such values can only be pursued if they are shared by its suppliers, a stakeholder category of crucial importance to the company.

To this end, SACMI has drawn up a Supplier Code of Conduct (SCC) which sets out these values and highlights conduct to be pursued, promoted or avoided.

# Contents



- 1** Application of the Code
- 2** Legal compliance
- 3** Business ethics and integrity
- 4** Human rights and social practices
- 5** Environmental safeguards and sustainability
- 6** Implementation of the Code

# 1 Application of the Code



The Supplier Code of Conduct defines the ethical principles and the rules of conduct that SACMI requires suppliers to observe (in addition to existing legal, regulatory and procedural provisions).

By accepting SCC, suppliers shall, in compliance with the principles set out therein, endeavor to:

- apply them and behave consistently with them in all working relations
- promote, throughout the supply chain, honest practices that ensure compliance with this SCC
- facilitate monitoring of compliance at every level of the supply chain.

Suppliers shall also disseminate SCC to their own employees when they work on behalf of SACMI.

## 2 Legal compliance



Suppliers shall always comply with national and international laws and regulations and shall endeavor to ensure strict adherence to corporate procedures indicated by SACMI vis-à-vis the goods and services they supply in accordance with the laws in force in the country where they operate.

SACMI has adopted an Organization and Management Model pursuant to Legislative Decree 231/2001 and also promotes its adoption throughout its supply chain.

# 3 Business ethics and integrity



SACMI sees business ethics and integrity as essential to its success and the protection of its reputation, its customers and all stakeholders. Consequently, SACMI requires suppliers to adopt practices based on the utmost fairness, transparency and responsibility in all commercial transactions and business relations.

**Corruption and money laundering** Suppliers shall commit to preventing and opposing all forms of corruption (e.g. bribes, fraudulence, money laundering) by adopting policies and procedures that ensure compliance with the laws in force and international ethical standards. In selecting its suppliers SACMI is extremely attentive to such values and expects such principles to be shared and observed throughout the supply chain.

In doing business with SACMI, suppliers shall refrain from offering gifts - directly or indirectly - to Group employees and/or their family members (except for common business courtesies deemed to be of reasonable frequency and value) or providing hospitality of any kind (unless strictly related to business/work requirements).

# 3 Business ethics and integrity



**Conflict of interest.** It is essential that suppliers act ethically and transparently: they must avoid situations in which personal or financial interests might influence - or appear to influence - decisions regarding their business arrangements with SACMI. Any potential conflict of interest shall promptly be disclosed to ensure integrity and trust in all business dealings.

**Whistleblowing.** SACMI strongly encourages suppliers to set up an effective internal reporting ('whistleblowing') system that allows employees, partners, consultants or third parties to report, also anonymously, any illegal or non-compliant conduct. Such systems shall allow whistleblowers to act in strict confidence and should protect them from any form of retaliation. The goal is to promote and safeguard business-related transparency and integrity.

# 3 Business ethics and integrity



**Protecting employees' personal data.** Suppliers shall comply with laws concerning the protection of their employees' personal data, in accordance with the EU General Data Protection Regulation (GDPR) and other regulations applicable in the country in which they operate. Personal data collection, processing and storage shall be performed in full compliance with the rights of the individuals concerned. Suppliers shall also take appropriate measures to ensure the confidentiality, accessibility and integrity of the information/systems used to manage contracts. To prevent security breaches, such measures may include access control, encryption, constant monitoring and vulnerability management.



## 4 Human rights and social practices



SACMI is committed to human rights and has a policy of diversity in terms of culture, race, gender and age; it guarantees equal opportunities and dignified employment practices. In keeping with the United Nations Global Compact and ILO Conventions, such principles must also be shared and observed by suppliers.

**Fair treatment, integration, non-discrimination.** Suppliers shall establish employment practices based on fairness and respect that comply with national laws. Any form of discrimination on the basis of gender, race, color, religion, sexual orientation, age, disability, political opinion, nationality, social or ethnic origin or trade union membership is prohibited.

Workers shall be treated fairly and guaranteed equal opportunities, dignity and respect. Working hours – overtime included - shall comply with laws, regulations, collective labor agreements and international conventions. Overtime shall not be used to compensate for insufficient wages; if overtime is required, it shall be remunerated according to applicable laws and agreements.

## 4 Human rights and social practices



Suppliers shall ensure fair and timely payment of wages which shall, at least, align with industry standards; they shall also comply with provisions concerning minimum wages, mandatory benefits and working hours. Overtime shall not be imposed by exploiting workers' vulnerability or threatening them with sanctions.

**Health and safety.** Suppliers shall comply with the health and safety regulations/standards in force in their respective countries. Suppliers shall endeavor to reduce the risk of accident, injury and occupational illness. To do so, they shall provide workers with the tools they need to perform their tasks in complete safety; they shall minimize risks and ensure the establishment and adoption of safe working practices.

**Forced labor, modern slavery, human trafficking.** SACMI believes that work should always be freely chosen. Suppliers must never, therefore, resort to any form of forced or compulsory labor, slavery or human trafficking. Suppliers shall not force their employees to work overtime hours that exceed those provided for by national laws.

## 4 Human rights and social practices



Workers shall not be deprived of their ID documents or freedom of movement.

**Child labor.** SACMI does not tolerate any form of child labor. Suppliers shall not hire individuals who have not yet reached the legal working age in the country in question.

**Illegal, clandestine and undeclared work.** Suppliers shall comply with laws that penalize illegal, clandestine and undeclared work. They must also employ workers with valid residence and work permits.

**Freedom of Association and Protection of the Right to Organize.** SACMI recognizes and protects worker's rights to freedom of association and collective bargaining. Suppliers shall respect workers' decisions to join or not join trade unions or other representative organizations and shall avoid all forms of interference, intimidation, retaliation or discrimination.

## 5 Environmental safeguards and sustainability



SACMI is aware of the environmental challenges of our time and is committed to reducing the environmental impact of its operations.

It works alongside suppliers and contractors to identify solutions that drive innovation and enhance the sustainability and safety of processes and products.

It actively encourages suppliers to adopt, as far as possible, solutions that augment the use of renewable resources, reduce harmful gas emissions, reduce water consumption and limit the exploitation of natural resources as these practices have a positive impact on the environment and on communities.

SACMI also promotes the adoption of systems that monitor, manage and reduce the organization's environmental impact as per UNI EN ISO 14001 and, in any case, recommends the adoption of internal practices that pursue the same goals.

# 5 Environmental safeguards and sustainability



Additionally, SACMI requires suppliers to:

- provide transparency on Scope 1, Scope 2 and Scope 3 greenhouse gas emissions data, calculated using recognized international standards (e.g. GHG Protocol, ISO 14064, ISO 14067), and set emissions reduction targets to achieve progressive decarbonization of processes and the supply chain.
- manage water resources responsibly by optimizing their use and setting exploitation reduction targets; suppliers shall also ensure discharged water is of a quality suitable for the relative ecosystem (with particular attention to areas that are water-stressed, of special environmental interest and/or characterized by biodiversity) by adopting wastewater recycling solutions.
- process and dispose of waste in compliance with the relative regulations by promoting the use of renewable and recycled raw materials, preventing the production of waste and maximizing quantities sent on for retrieval and recycling in keeping with circular economic principles.

# 6 Implementation of the Code



SACMI requires suppliers to take a proactive approach to supply chain management in order to identify, assess and mitigate environmental, social and governance (ESG) risks throughout the procurement cycle. To this end, suppliers shall take all necessary measures to ensure their operations comply with the principles and rules of conduct set out in this Supplier Code of Conduct (SCC).

More specifically, suppliers shall:

- implement due diligence procedures to monitor and assess their own practices, especially as regards human rights, working conditions, environmental safeguards and ethical integrity.
- provide, at SACMI's request, documentary evidence, reports or self-assessments attesting to the effectiveness of the adopted due diligence procedures.
- cooperate with SACMI in the event of audits, inspections or requests for further information and promptly take the necessary corrective action in the event of non-compliance.
- promptly report any problems, violations or significant risks identified within its supply chain.

## 6 Implementation of the Code



SACMI reserves the right to verify compliance with the principles set out in SCC by monitoring performance as it deems appropriate (e.g. audits, inspections or requests for documentation). Should SACMI find any non-compliances, improvement plans to remedy the non-compliance can be agreed on with the supplier.

Failure to comply with the provisions may result in suspension and/or termination of business relations. In the event of serious and repeated violations, SACMI may take action to protect its image and reputation.

