

Supplier Code of Conduct

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with LOMBARDI

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1. Our commitment

As a leading law firm, BonelliErede is conscious of the broader role it has to play and of the importance of a more sustainable future. That is why every day we pursue six of the sustainable development goals of the UN 2030 Agenda (https://www.belex.com/en/csr_post/united-nations-2030-agenda).

Key to achieving these goals is responsible and sustainable procurement (see section 4, 'Fundamental principles'), and this code of conduct (“**Code**”) helps ensure just that.

This Code lays the foundation for a structured supplier management process and outlines what we expect from suppliers.

We are firm believers in the principles laid out in this Code and are committed to applying them and promoting them to help create a more sustainable future, in line with our sustainable procurement policy.

That is why we always prefer suppliers that share the principles expressed in this Code and concretely apply them.

2. Purpose and objectives

The purpose of this Code is to encourage all suppliers of the products and services our firm uses to apply sustainable procurement practices. And as a supplier, you are expected to adhere to the principles and standards laid out in this Code to the extent possible, in your own operations and along your supply chain.

We reserve the right to terminate relationships with suppliers that do not adhere to this Code.

3. Scope

This Code applies to all suppliers of BonelliErede's Italian offices and relies on your help and cooperation to ensure the principles are applied.

4. Fundamental principles

BonelliErede respects and protects fundamental human rights as defined by the laws and regulations of the individual countries in which we operate and the applicable international standards. We also are firm believers that environmental protection is the foundation for ensuring sustainability for future generations.

For this reason, each of our suppliers are required to respect the following principles, which we consider fundamental for sustainable operations:

- Compliance with regulatory requirements, laws and standards in the supplier's country

- Respect for human rights
- Protection of the health and safety of the supplier's people and the local community
- Adoption of responsible policies that are geared towards environmental protection and preservation
- Respect for work ethics and alignment with the commitments undertaken
- Opposition to every kind of corruption
- Protection of the IT security of all data and information processed in the course of business, with particular regard to confidential information

The principles detailed in the sections below are based on the values set out in our code of ethics, our human rights and D&I policy, and our environmental policy.

5. Labour and human rights

Respect for human rights is fundamental. At BonelliErede, this means above all ensuring an open and inclusive workplace where everyone can work safely and express themselves freely.

For us, it is equally important that our suppliers commit to the same principles, especially the following:

- **Non-discrimination:** Opposition to all forms of direct or indirect discrimination based on gender, marital status, sexual orientation, religious or political beliefs, trade union membership, skin colour, ethnic origin, nationality, age, social background and status, and physical and mental disability. Our suppliers must also, if they have not already, formally commit to promoting diversity and inclusion within their own business. This means that our suppliers must not discriminate in hiring, remuneration, access to training, promotion, employment termination, dismissal, or retirement.
- **Anti-harassment:** Zero tolerance of physical or psychological violence, coercion, and harassment. Although the legal definition of harassment may vary depending on location and cultural norms, suppliers must adhere to the

standards set out under Italian law as applied by BonelliErede.

- **Health and safety:** Compliance with all health and safety laws and regulations in force. BonelliErede expects its suppliers to adopt practices to minimise health and safety risks, support accident prevention, and ensure a safe workplace for all workers.
- **Forced and child labour:** Zero tolerance of all forms of exploitation of workers, including child, forced and compulsory labour, and all forms of abuse and psychological and physical coercion.
- **Freedom of association:** Recognition of the right to freely form trade unions and to bargain collectively.
- **Fair wages and working hours:** Compliance with all local laws and regulations on wages, benefits and working hours, including paying at least the minimum wage if one exists.

6. Integrity and ethics

BonelliErede does not tolerate any form of corruption and believes that integrity and ethics in conducting business are fundamental to a sustainable relationship with suppliers. In line with the ethical and professional commitments and responsibilities in conducting business affairs and operations set out in our code of ethics, our suppliers are required to be highly diligent in ensuring adherence to the following principles:

- **Business integrity:** Commitment to comply with regulations, operate in accordance with ethical principles, and ensure fair business practices. We are firm believers in fair competition – however so defined in the various competition and antitrust laws of the countries we operate in.
- **Financial crimes and corruption:** Zero tolerance of all forms of bribery, incitement to commit bribery, and extortion.
- **Gifts:** Remuneration for a service is defined by contract and corresponds exclusively to the service provided; any kind of gift that could unduly influence decisions must not be offered or accepted.

- **Conflict of interest:** Commitment to refrain from seeking undue advantages by influencing BonelliErede people to make decisions on the firm's behalf that are not objective or appropriate. Suppliers must also inform the firm of any seeming behaviour of this kind by BonelliErede people.
- **Confidentiality and privacy:** Guaranteed compliance with current privacy regulations and commitment to protect the confidentiality of all information that comes into a supplier's possession in supplying its services/products. Suppliers must also refrain from improperly using or unduly disseminating any such information.

7. Environment

BonelliErede is an advocate of protecting the environment and biodiversity. We choose suppliers that are local to our offices and purchase environmentally friendly products whenever possible, as the supply chain plays an important part in our environmental impact. And that is why our suppliers are required to adhere to the following principles:

- **Resource efficiency:** Optimisation of the use of natural and energy resources by reducing their use over time and increasing the efficiency of processes.
- **Waste management:** Correct management of (hazardous and non-hazardous) waste to minimise its impact on environmental pollution and community health. We also encourage suppliers to work towards reducing waste and, where applicable, adhering to circularity principles, e.g., recycling or reuse.
- **Pollution and emissions:** Reduction of climate-altering emissions and toxic or hazardous pollutants over time.

8. Reports

Suppliers must report any violation or suspected violation of the principles underlying this Code in writing but not anonymously. The report will be investigated and, if necessary, the person who reported the (suspected) violation and the person accused will be contacted.

Reports should be emailed to acquistisostenibili@belex.com, which is managed by the Administration and Finance dept and the Compliance dept.

BonelliErede protects people who report suspicions against any kind of retaliation or action that could give even a mere hint of discrimination or penalisation (e.g., termination of business relations/a supply agreement). We also ensure that the identity of anyone who reports suspicions remains confidential, without prejudice to legal obligations.

9. Monitoring

BonelliErede reserves the right to check that a given supplier is adhering to the abovementioned principles, in which case the supplier will be notified well in advance. Failure to meet our standards and comply with the applicable regulations may result in termination of the supply agreement and, depending on the seriousness of the failure, the local authorities being notified.

10. Roles and responsibilities

Anyone who requests goods or services from a supplier on the firm's behalf is responsible for ensuring adherence to this Code.

11. Validity

This Code will come into force on the date of its approval and is not retroactively effective. It will be updated whenever necessary and at least every five years.

12. Where this Code is available

This Code is available internally on the firm's portal and externally on the firm's website. Once this Code is in force, the firm reserves the right to incorporate this Code by reference in supplier agreements and any modifications thereto.