

# Sustainable Procurement Policy

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**BonelliErede**  
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](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 policy helps ensure just that throughout the firm.

## **2. Purpose and objectives**

This policy is designed to serve as a reference to ensure our procurement processes take increasing account of sustainability criteria and are based on the fundamental principles mentioned in section 4.

## **3. Scope**

This policy applies to all of BonelliErede’s Italian offices.

## **4. Fundamental principles**

BonelliErede respects and protects fundamental human rights as defined by Italian law and regulations and the applicable international standards. We are also 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 above principles are based on the values set out in our code of ethics, our human rights and D&I policy, and our environmental policy.

## 5. Suppliers

In line with our code of ethics and supplier code of conduct, and in addition to promoting the general principles described above, this policy is also aimed at increasing awareness within the firm regarding our suppliers and improving our assessment process.

When multiple suppliers offer the same price and quality, BonelliErede chooses the supplier that:

- have **local** offices;
- produce **environmentally friendly**, non-toxic products with the lowest possible environmental impact;
- value diversity and inclusion;
- **create employment opportunities** for demographic groups affected by long-term underemployment (e.g., programmes to help people with a prison record re-enter the labour market);
- apply **good practices regarding governance, ethics and anti-corruption** (e.g., code of ethics, organisation and management model under Legislative Decree 231/01, and a reporting system); and
- apply **good practices regarding social/environmental matters** that go beyond legal requirements (e.g., production processes with a low environmental impact and additional safeguards for workers).

BonelliErede also prefers suppliers – and products – that meet third-party environmental and social certification standards, including the following:

- B Corporation certification
- Bronze, silver, gold or platinum Ecovadis

- FSC and PEFC certification
- Organic certification
- Fair trade certification
- Leadership in Energy and Environmental Design (LEED) certification
- ISO9001 certification
- Environmental management system (ISO14001 or EMAS)

Other independent third-party certifications may be considered on a case-by-case basis.

Although this policy applies to all procurement, sections 6, 7, 8 and 9 below address certain areas that are particularly relevant to our business.

## **6. Paper and office supplies**

Some of the products we use most are paper and, more generally, office supplies; we therefore see their procurement as especially important.

Our people are continually encouraged to reduce the amount of supplies used.

Purchases of essential office supplies, including paper products (business cards, envelopes, paper, etc.), are considered sustainable if they meet the following requirements:

- They are made partly from recycled or recyclable material, on condition quality is not compromised.
- They are made of FSC-PEFC certified paper and preferably unbleached and chlorine-free.
- They have a low energy impact (e.g., LED lamps).

## **7. Electronic equipment**

We encourage the use of durable and sustainable products with Energy Star/EPEAT certification or equivalent for electrical equipment, office equipment, monitors, televisions, mobile phones, adapters, and other audiovisual devices. We also prefer

suppliers that offset the CO<sub>2</sub> equivalent generated, e.g., by purchasing carbon credits from recognised associations, supporting sustainable projects, or contributing to direct reforestation/planting initiatives.

## **8. Cleaning products**

We prefer cleaning products with sustainability certifications, e.g., from the Global Ecolabelling Network, in compliance with ISO 14024 (Ecolabels, Blauer Engel, White Swan or equivalent).

## **9. Restaurants and catering**

For the restaurants in our offices and the catering services at our events, we prioritise the use of local and short supply chain goods and favour environmentally sustainable materials to reduce the use of plastic.

## **10. Reports**

Any violation or suspected violation of the principles underlying this policy can be reported to general management in writing but not anonymously. General management will investigate the matter and, if necessary, contact the person who reported the (suspected) violation and the person accused.

Reports should be emailed to [acquistisostenibili@belex.com](mailto: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 a supply agreement). We also ensure that the identity of anyone who reports suspicions remains confidential, without prejudice to legal obligations.

## **11. Monitoring, reporting and transparency**

We monitor our relationships with suppliers and our operations to ensure the commitments are honoured.

To measure the extent to which our actions match our commitment to sustainable procurement, we intend to adopt a monitoring system based also on the GRI Standards. The KPIs set out in the standards will enable us to track the main data trends and the results of the improvement measures introduced over time in the areas covered by this policy.

## **12. Roles and responsibilities**

Anyone who requests goods or services from a supplier, i.e., the principal, on the firm's behalf is responsible for ensuring adherence to this policy.

## **13. Validity**

This policy 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.

## **14. Where this policy is available**

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