

Supplier Code of Conduct

TREVI- Finanziaria Industriale S.p.A.

2022



SUPPLIER CODE OF CONDUCT

A code of conduct for suppliers is created in order to ensure that a company's suppliers adhere to high standards of safe working conditions, fair and respectful treatment of employees and ethical practices.

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I. INTRODUCTION

The Trevi Group is a worldwide leader in the field of underground engineering for special foundations, tunnel excavations and soil consolidation as well as in the design and marketing of industry-related specialised technologies.

Internationalisation, integration and the continuous interchange between its two divisions are among the reasons for its success, specifically: Trevi, which carries out special foundations and soil consolidation works for large infrastructure projects (*subways, dams, ports and docks, bridges, railway and highway lines, industrial and civil buildings*), secures polluted sites in addition to build and manage underground and automated car parks and Soilmec, which designs, manufactures and markets machinery, systems and services for underground engineering.

II. SCOPE OF APPLICATION AND RECIPIENTS

The Suppliers of goods and services who cooperate with the Trevi Group are expected to comply with this Code, of which the Trevi Group Code of Ethics (*attached hereto*) and the Model pursuant to Legislative Decree 231/01 (*which can be consulted on the Company's website*) are an integral part.

Therefore, the Group promotes its dissemination and application within the scope of its commercial relationships. Observance of the rules of this Code, or the existence of a Code of Ethics and a Model pursuant to Legislative Decree 231/01 of the same Supplier providing for similar obligations, shall be an essential part of the obligations assumed by recipients on whatever basis and for all legal purposes towards the Trevi Group. Suppliers are in turn required to inform, share and describe to their own employees, sub-suppliers, collaborators and the employees of the latter the principles laid out in the Supplier Code of Conduct, guaranteeing and verifying compliance with it.

III. GOVERNANCE AND FIGHT AGAINST CORRUPTION

3.1 Antitrust, anti-corruption and anti-money laundering

Suppliers are required to respect applicable antitrust laws and regulations and pursue the principles of fair and transparent competition; they are also required not to use, for the purposes of winning a supply, unfair tactics, such as the abuse of their position within the market or the creation of cartels in order to exclude other companies from the tenders, also by way of price fixing practices.

Suppliers are also prohibited from enacting any practice that may restrict or be capable of unlawfully disrupting the market in performing their activities.

Suppliers shall adopt a fair and impartial policy when choosing their own suppliers.

Both Suppliers and their sub-contractors are required to operate in full compliance with laws and not to practice or tolerate any kind of corruption, active or passive, explicit or implicit.

Suppliers are also required to respect laws on anti-money laundering, self-laundering and handling of stolen money, goods or other benefits.

3.2 Conflict of interest

Suppliers shall undertake to avoid any situation that may lead to conflict of interest or that may interfere with the capacity to make impartial decisions.

Suppliers are required to conduct themselves in a manner compliant with the principles of business ethics and transparency and are called upon to avoid any and all conflicts of interests capable of influencing the commercial relationship with the Trevi Group or which could interfere with their capacity to perform their activities impartially and for the benefit of the Group, or of other third parties.

Suppliers shall report any situation that may result in a conflict of interest to the Trevi Group, before establishing any business relationship.

3.3 Privacy and intellectual property

Suppliers shall process, collect, store and manage personal data in compliance with applicable privacy regulations and store them carefully and for a period appropriate to the expressed requirement,

protecting their access by unauthorised entities and guaranteeing their integrity and confidentiality through the most suitable technical and organisational tools.

Suppliers are required to respect and protect the confidential information, know-how and intellectual property of the Group and of third parties and shall be deemed liable for the use or violation of patents and/or trademarks and/or other intellectual property rights relating to the utilisation of materials, machinery or work methods used in the performance of their activities.

The confidentiality obligation shall remain in force even after the termination of the relationship with the Trevi Group.

IV. PROTECTION OF HUMAN RIGHTS

4.1 Equal opportunities, child labour and human rights

Suppliers are required to ensure that all persons are treated in a manner that promotes the dignity, health, freedom and equality of all workers, without any discrimination based on race, colour, gender, language, religion, ethnic origin, mental or physical disability, civil status, sexual orientation or political or union opinions and to ensure protection from all forms of exploitation of child labour.

Suppliers shall also guarantee a workplace free of harassment, threats or any other form of abuse or physical or sexual, psychological or verbal harassment.

Suppliers are required not to conduct themselves in any manner whatsoever that limits personal rights and freedoms in any phase of the working relationship.

4.2 Occupational health and safety

Suppliers are required to respect all applicable laws and regulations relating to worker health and safety, occupational health and workplace accident prevention.

They are also required, regardless of local laws, to reduce to a minimum workplace accidents and incidents, also through appropriate awareness-raising, information, training and education programmes for workers, encouraging the adoption of responsible and safe behaviours.

V. SOCIAL ASPECT

The Trevi Group strongly believes that “the first step towards the evolution of ethics is solidarity with fellow human beings”.

The Company requests its Suppliers to:

- respect local cultures and traditions, as well as the regulations applicable in the countries in which they operate, reducing to a minimum the inconveniences caused to local communities;
- support the local economy, by employing local personnel and suppliers;
- promote and support social and cultural solidarity initiatives at local level, through real participation and organisational and economic support for people, bodies and organisations aiming at the full affirmation of human dignity.

VI. ENVIRONMENTAL ASPECTS

Suppliers are required to abide by applicable environmental laws, respecting the local environment and favouring the responsible use of recycled products or those less harmful to the environment. Specifically, it is of utmost importance to reduce to a minimum the environmental impacts resulting from their activities, preserving local ecosystems and biodiversity and limiting, where possible, the production of waste, emissions and effluents, as well as promoting the use of renewable sources.

VII. MONITORING

7.1 Methods for carrying out audits and control activities

Upon request of the Trevi Group, Suppliers shall provide all the information necessary for a proper and comprehensive assessment.

If the Supplier is unable to satisfy the principles of this Code, in part or as a whole, the Group shall be promptly informed in this regard.

The Trevi Group reserves the right to perform investigations and inspections, either directly or through formally engaged third parties, in order to verify the compliance with this Code.

7.2 Management and assessment of cases of non-compliance

If cases of non-compliance with the provisions of this Code are identified in the Qualification phase and/or on the occasion of subsequent checks, the Trevi Group reserves the right to require Suppliers to implement corrective measures.

Should corrective measures not be implemented, or in the case of serious or systematic breach of this Code or of the same principles set out in the Code of Ethics of the Supplier, the Trevi Group reserves the right to early terminate the working relationship with the said Supplier.

Without prejudice to the foregoing, any further consequences that are specifically stipulated and established in the existing contract with the Supplier shall remain unaffected.

VIII. REPORTING

Constant and transparent dialogue forms the basis of the relationships between the Trevi Group and its Suppliers. Any violations of the contents of this document - even suspected - shall be properly communicated to the relevant Function:

- by way of the dedicated software available on the website <https://trevifin.segnalazioni.net/>
or
- by writing to **TREVI Finanziaria Industriale S.p.A. Via Larga, 201 - 47522 Cesena - FC - Italy**,
to the attention of **“Ufficio Segnalazioni Whistleblowing / Internal Audit”**.

The Company manages reports received in accordance with the provisions of corporate procedures and regulations of reference, also guaranteeing whistleblowers - among other things - protection against any form of retaliation, discrimination or penalisation.

8.1 Document development

The Supplier Code of Conduct is not a static document.

In order for it to remain an important reference point and to guarantee the adequacy and effectiveness of its contents and application, it is subject to periodic review on the basis of regulatory and legislative developments, best practices and input from stakeholders.

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