



SUPPLIER CODE OF
CONDUCT
ALMAVIVA GROUP

April 2024
Version 1

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1. INTRODUCTION

This “Supplier Code of Conduct” (Code) defines the ethical principles and behavioral guidelines that the Almaviva Group (Group) requires all its suppliers (of goods, services, works) to adhere to.

These principles comply with all current national and international laws and regulations and comply with the codes of conduct outlined in the ILO Core Conventions (particularly ILO 87 and ILO 98 regarding freedom of association and collective bargaining, ILO 29 and ILO 105 regarding the abolition of forced labor, ILO 111 and ILO 100 regarding equality, and, finally, ILO 138 and ILO 182 regarding child labor).

These principles comply with the dictates of current legislation and the statements of the Group’s Integrated Management System, in accordance with the highest quality standards and international certifications held by the Group, the list of which is available and can be viewed on the Almaviva Group’s website in the section [Certifications and Statements | Almaviva](#).

Through this Code, the Group is committed to operating in an ethical and sustainable manner, respecting the laws and regulations of the countries in which it operates, adhering to the highest standards of integrity, and rejecting all forms of corruption and conflicts of interest. For this reason, we hope that suppliers, in addition to adopting the principles outlined in this Code, will also apply them throughout their supply chain.

The Code is based on the principles included in Organizational Model “231”, the Group’s Code of Ethics, the Group’s Internal Control System, and other corporate policies that protect people’s fundamental rights, their health and safety, transparency, and sustainable development, in the belief that ethical business conduct is also essential for the company’s success.

2. OUR COMMITMENT TO SUSTAINABILITY

The Almaviva Group accompanies the growth of the country’s system, supporting enterprises in the new challenges they face in order to remain competitive in the digital age and innovating their business model, organization, corporate culture, and information and communications technology.

As a technology company, the Group is dedicated to contributing to sustainable development through innovative technologies that have a positive impact on the planet and on the people who live on it.

Aware that our corporate activities have an impact on the environment in which we operate, the Group commits to:

- ensuring the health and safety of employees and collaborators in the workplace;
- verifying that clients, suppliers, and partners comply with health and safety regulations;
- minimizing pollution and negative impacts resulting from activities;
- maintaining the highest standards in its handling of the personal data of all stakeholders with whom it works, respecting their fundamental rights and freedoms, as well as the

dignity of all those involved, and guaranteeing the confidentiality, integrity, and availability of information, protecting it from possible attacks or unauthorized use;

- assuming a role of responsibility when it comes to safeguarding the personal dignity, individual freedom, and well-being of the people with whom it works and collaborates;
- improving environmental and energy performance and developing solutions that enable clients to sustainably manage their businesses and transform them into the businesses of the future.

Based on the above statements, the Group recognizes the importance of ensuring a transparent supply chain and of considering its social and environmental impact in order to protect its stakeholders. For this reason, during contract negotiations, it requires its suppliers to agree to principles and clauses consistent with those specified in the Almaviva Group's Supplier Code of Conduct, typically included in the standard terms and conditions of the contract.

Specifically, suppliers are required to adhere to the principles set forth in Annex 1, "Environmental, Social, and Governance Commitment", of the Code.

3. OUR PRINCIPLES

3.1 CHILD LABOR AND FORCED LABOR

The supplier certifies that no product and/or service supplied to the Group by itself or by any of its subcontractors has made use of forced labor, understood to be any work or service performed by a person involuntarily under threat of punishment or retaliation or as a form of payment for a debt.

The supplier also certifies that it has not resorted to child labor, forced labor, penal labor, hazardous labor, or disguised labor and/or employed children under 16 years of age, acknowledging that this age limit is stricter than that imposed by ILO Convention 138.

The supplier condemns any and all other forms of involuntary labor and works to ensure that all of its employees are free from physical constraints, abuse, threats, or other unlawful practices.

3.2 WORKING CONDITIONS

The supplier is required to ensure its employees and collaborators working conditions that safeguard human dignity, in compliance with all applicable laws and regulations regarding wages and working hours, overtime, pay and contributions to social security, leave, and vacation and sick days, in accordance with the Human Rights, Diversity, Gender Equality, Slavery, and Human Trafficking Policy adopted by the Group.

The supplier is required to take into consideration the promotion of their employees' and collaborators' work-life balance, training, and personal development.

The supplier pays all of its employees a fair wage that guarantees its workers and their families a decent standard of living.

The supplier commits to maintaining a harassment-free work environment and to condemn any form of violence, threat, or intimidation as well as any sexual, psychological, physical, or verbal abuse targeting an individual's personal and/or cultural differences, including any attitude, behavior, or situation that may constitute harassment.

3.3 DIVERSITY AND EQUAL OPPORTUNITY

The supplier commits to promoting a work environment that fosters gender equality at every level and overcomes all stereotypes.

The supplier commits to respecting, including, and celebrating the unique qualities of all persons, offering equal opportunities and fair treatment, regardless of social, cultural, ethnic, and/or national origins, religious beliefs, political and/or sexual orientation, gender identity, nationality, ethnicity, class, trade union affiliation, marital status, disability, and/or age, or any other personal, cultural, and/or professional category of the individual.

3.4 FREEDOM OF ASSOCIATION

The supplier must respect all of its employees' right to join a trade union and to engage in collective bargaining, in accordance with current laws and regulations.

3.5 QUALITY

The supplier is required to provide services that always meet the needs of the Group and are consistent with the quality standards agreed upon in the contract, as well as to comply with the quality and safety requirements mandated by the relevant applicable legislation.

3.6 ENVIRONMENT

The Group evaluates the environmental and energy performance of its suppliers, identifying both direct and indirect environmental aspects and related impacts, and encourages them to adopt sustainable solutions, especially in relation to reducing emissions, water and energy consumption, impact on biodiversity, and waste production.

3.7 HEALTH AND SAFETY

The supplier is required to comply with all applicable health and safety laws, regulations, and practices, as well as the standard norms and quality and safety requirements mandated by the relevant applicable legislation, and to uphold the principles recognized and implemented by the Group in this regard, as outlined in the Group Health and Safety Policy.

Suppliers are also required to take appropriate measures and to promote initiatives that contribute to the continuous improvement of production processes and ensure a safe and healthy workplace.

3.8 CONFLICT OF INTEREST

The Group requires its suppliers to be free from any conflicts of interest. A "conflict of interest" refers to any situation that could call into question the supplier's ability to act impartially with respect to the interests of the Group. Conflicts of interest can arise in a variety of ways. If you believe you are facing a real or potential conflict of interest with the Group or any of its

employees, you are obligated to report all the details of the case to the Group through the channels provided in the Suppliers Area and on the Group's institutional website.

3.9 INTELLECTUAL PROPERTY AND CONFIDENTIALITY

The supplier and its employees, collaborators, and contractors must maintain confidentiality regarding all reserved and sensitive information pertaining to the Group to which they have access, in accordance with what is deemed necessary for the normal course of business activities performed for the Group or as required by applicable laws or contractual agreements.

3.10 INFORMATION SECURITY

The Group commits to ensuring that the principles it has recognized and implemented regarding information security are recognized and adopted throughout the supply chain. The supplier must, therefore, protect the Group's data from unauthorized access and respect all data protection laws.

3.11 ETHICS

The supplier is required to conduct its business activities in compliance with the rules of fair and ethical competition in accordance with relevant legislation and to comply with all applicable laws, in particular refraining from price-fixing with competitors, bid rigging, assigning clients or markets, or exchanging information about current, recent, or future prices with competitors. Furthermore, all forms of corruption, such as bribery, extortion, or embezzlement, are strictly prohibited.

3.12 REPORTING VIOLATIONS

Suppliers must promptly report to the Group any conduct, including that of Group employees, that is deemed to constitute improper behavior or a suspected/potential violation of this Code via the channels present in the Group's Suppliers Area and on the Almaviva institutional website. Reports will be handled anonymously.

4. DISSEMINATION

This Code is subject to periodic review and may be updated to comply with changes in national and international legislation or when there is a concrete need to do so.

5. ANNEXES

Annex 1 “Environmental, Social, and Governance Commitment” of the Supplier Code of Conduct

AREA 1 - CHILD LABOR	1.1 – The supplier does not employ workers under the age of 16.
AREA 2 - FORCED LABOR	2.1 – The supplier refuses to resort to any form of forced labor.
AREA 3 - HEALTH AND SAFETY (Legislative Decree 81/2008)	3.1 – The supplier is in compliance with all applicable occupational health and safety regulations.
	3.2 – The supplier must notify the Almaviva Group regarding any fine or sanction of any kind issued by the relevant authorities for violations of occupational health and safety regulations.
AREA 4 - FREEDOM OF ASSOCIATION	4.1 - Workers are allowed, in cases provided by law, to form, participate in, and organize unions if they so choose and to engage in collective bargaining with the supplier.
	4.2 – Workers are granted an appropriate amount of annual leave to participate in union activities.
	4.3 - Spaces are made available for bulletin boards and union meeting rooms.
AREA 5 - DISCRIMINATION	5.1 – The supplier will work to ensure that no cases of discrimination based on race, gender, sexual orientation, class, background, ethnicity, physical or health condition, religion, age, trade union membership, or political affiliation occur in any workplace setting.
AREA 6 - DISCIPLINARY PROCEDURES/PRACTICES	6.1 – The supplier is in compliance with all applicable rules regarding disciplinary procedures.
	6.2 – The Disciplinary Code is made available to workers in a clear and accessible form.
AREA 7 - WORKING HOURS	7.1 – The maximum annual overtime limit set by the relevant CCNL (National Collective Bargaining Agreement) is respected.
	7.2 – Weekly rest periods are guaranteed and granted to all workers.
	7.3 – Overtime is voluntary and paid according to the terms stipulated in the contract and/or as dictated by law.
AREA 8 - REMUNERATION	8.1 – The employee payroll is up to date and the salary list indicates all components of remuneration.
	8.2 – All contributions specified in labor contracts and required by law are paid.

	8.3 – The company’s remuneration policy is based on principles of fairness and non-discrimination.
	8.4 – Company wages are sufficient to provide workers and their family with a minimum standard of living.
AREA 9 - ENVIRONMENTAL PROTECTION	9.1 – The supplier adopts responsible behaviors aimed at rationalizing consumption and reducing waste through the implementation of eco-friendly policies and by raising environmental awareness among its personnel and subcontractors.
	9.2 – The supplier promotes conscientious consumption of paper, electricity, fuel, and water.
	9.3 – The supplier ensures the proper collection and disposal of the waste produced, especially that which is hazardous and/or highly polluting.
	9.4 – The supplier monitors energy and fuel consumption and related emissions, water and paper consumption, and waste production, with particular attention paid to waste containing toxic substances that are highly polluting and difficult to dispose of.
	9.5 – The supplier encourages progressive improvement of energy-efficient systems in order to curb consumption and carbon dioxide emissions.
	9.6 – In the process of procuring equipment, tools, and consumables, the supplier considers factors such as lowest environmental and social impact as well as the energy efficiency of the goods and/or services requested.
	9.7 – The supplier encourages the spread of environmental awareness and conservation among all stakeholders, both internally and externally, including its own suppliers whose work contributes to the company’s production chain.
AREA 10 - DIVERSITY, FAIRNESS, AND INCLUSION	10.1 – The supplier promotes a corporate policy that fosters a culture of inclusion, fairness, non-discrimination, and respect for diversity.
	10.2 – The supplier incorporates the principles of inclusion, fairness, non-discrimination, and respect for diversity in the definition of processes that govern fundamental aspects of its employees’ work life (for example: recruitment, compensation, internal and external mobility, merit-based policies, termination of employment, etc.).
	10.3 – In the process of procuring goods and/or services, the supplier considers, among other criteria, the principles of diversity, fairness, and inclusion.
AREA 11 - INFORMATION SECURITY	11.1 – An inventory of information and other resources associated with the supply of goods/and services, including owners, is developed and maintained.

	11.2 – The supplier’s personnel must return all assets and information belonging to the Company and the Client upon modification or termination of their employment, contract, or agreement.
	11.3 – Rules, procedures, and/or agreements are in place for the transfer of supply-related information within the supplier’s organization and between the supplier and any other relevant third party.
	11.4 – The supplier plans and prepares for the management of information security incidents by defining, establishing, and communicating the relevant processes, roles, and responsibilities.
	11.5 – Supply data is protected against loss, destruction, falsification, unauthorized access, and unauthorized disclosure and is securely deleted when no longer needed.
	11.6 – The supplier fulfills the requirements related to the protection of privacy and personal information associated with the supply in accordance with applicable laws, regulations, and contractual requirements.
	11.7 – The supplier’s personnel and any relevant third party involved in the supply are made suitably aware of, and receive proper instruction and training in, information security.
	11.8 – Appropriate security measures are implemented to protect supply information that is processed or stored outside of the supplier’s premises when employees work remotely.
	11.9 – Supplier equipment containing storage media is checked to ensure that all supply data has been securely removed or overwritten before it is disposed of or reused.
	11.10 – The supplier has measures in place to protect against malware, supported by appropriate awareness efforts.
	11.11 – The supplier establishes and enforces rules for the secure development of software and systems related to the supply.
	11.12 – The supplier integrates information security in the management of the subcontracting chain.