

Supplier Code of Conduct

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 <small>TOGETHER WE CREATE TOGETHER WE GROW</small>	Supplier Code of Conduct	Rev. 0 September 1, 2023
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1. Sustainability and Ethical Collaboration for EFGROUP

Our sustainable approach combines principles of integrity, impartiality, and transparency, diligence and professionalism, fairness and honesty, legality, loyalty, customer focus, fairness, and the value of the individual. Furthermore, we ensure the utmost attention to workplace safety, environmental protection, responsibility to the community, confidentiality, and absolute respect for laws and sustainability, as defined in the EFGROUP Code of Ethics, Organizational, Management, and Control Model pursuant to Legislative Decree 231/01, and other group contracts and agreements. Collaboration with the supply chain is essential for ethical standards and sustainable development.

2. Scope and Recipients

This Supplier Code of Conduct is a set of guidelines that establishes ethical and behavioural expectations for suppliers and business partners of a company. It defines the rules to ensure responsible business interactions, legal compliance, and integrity in supply relationships. "Suppliers" are entities or individuals that provide goods or services to the company.

The guidelines of this Code are influenced by the principles outlined in the essential Conventions of the ILO (International Labour Organization) and in the Universal Declaration of Human Rights of the United Nations, as well as by the ten principles established by the United Nations Global Compact.

This Supplier Code of Conduct, together with the Code of Ethics, Organizational, Management, and Control Model pursuant to Legislative Decree 231/01, and other contractual information and documents (order confirmation, trade fair regulations), constitutes an integral part of the contractual relationships with our company.

Our commitment is to adopt the Supplier Code of Conduct, which goes beyond legal, regulatory, and procedural provisions to define ethical and behavioural principles. In this context, the principles and provisions of the Supplier Code of Conduct serve as guidelines for all our Suppliers, collaborators, subcontractors, and other parties involved in EFGROUP operations. By accepting this Code, they commit to adhering to the values and principles it represents. This commitment includes the ongoing application of sustainability principles and appropriate behaviour.

We recognize that implementing some provisions of the Code may pose challenges, considering the different legal and cultural contexts. However, we expect Suppliers to address these challenges promptly and strive to comply, even if only partially.

To ensure the effective implementation of the Code, Suppliers must designate at least one person responsible for communicating and overseeing compliance with its provisions (as named in the attached form). Additionally, they must ensure that all workers involved in activities related to the goods or services provided to EFGROUP are adequately informed about the Code through effective communications.

Especially, suppliers are required to ensure that their staff and the staff of their suppliers are adequately informed about the content of this document and act in accordance with the principles of conduct outlined herein during the execution of contractual relationships with EFGROUP.

This "Supplier Code of Conduct" is an integral part of the contractual relationships with EFGROUP. We expect all suppliers and their involved parties to operate in accordance with the conduct principles defined in this document, thus reflecting EFGROUP's commitment to ethical and sustainable collaboration.

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3. Ethics, Governance, and Corporate Integrity

3.1. Integrity, Transparency, and Compliance with Legal Requirements

EFGROUP is committed to complying with all international, community, national, or local laws and regulations in force in the countries where it operates, along with generally accepted practices. EFGROUP promotes the adoption of policies and procedures to ensure compliance with laws and preserve corporate integrity.

Suppliers of EFGROUP are required to comply with applicable national and international laws regarding the goods and services provided, along with any other applicable international agreements within the existing contractual relationship with EFGROUP and contractual agreements with EFGROUP, and to operate in accordance with this Code, Code of Ethics, and Organizational, Management, and Control Model pursuant to Legislative Decree 231/01. In the event of a conflict between the provisions of the Code and applicable laws, the more restrictive requirement must be adhered to, with communication shared with EFGROUP. In the absence of more restrictive requirements, the prevailing legislation applies. If no more restrictive requirement exists, the applicable legislation will prevail.

3.2. Anti-corruption and Anti-money laundering

EFGROUP is committed to upholding the highest standards of integrity, honesty, and fairness in all relationships, both within and outside the Company.

EFGROUP requires its business partners to operate ethically, respecting current anti-money laundering and anti-corruption laws. Suppliers must refrain from offering or promising money or other benefits to obtain favourable treatment. They must also comply with laws on accounting, taxation, and transparency, avoiding illicit practices. Ethical and sustainable collaboration with EFGROUP demands compliance with these requirements.

It is specified that EFGROUP has adopted a zero-tolerance policy towards behaviours that violate the principles outlined, particularly regarding corruption involving public officials or any other party connected or associated with public officials, in any form or manner.

3.3. Ethical Commitments and Conflict of Interest

In our commitment to corporate ethics and transparency, our business partners are required to avoid conflicts of interest that could compromise the relationship with EFGROUP or interfere with their impartial activities in favour of the Group or third parties.

Suppliers, in collaborating with EFGROUP, are obliged to avoid any behaviour that could undermine trust and must promptly communicate any conflict-of-interest situations. Furthermore, during their working relationship with EFGROUP, they must refrain from using personal relationships with EFGROUP employees to gain improper advantages.

EFGROUP is committed to preventing conflicts of interest, and in this context, business partners are required to avoid circumstances that may generate conflicts of interest and must report any potential situation that could lead to favouritism, collusive practices, or illicit advantages to the email address: whistleblowing@ef-group.net. This includes connections or interests involving Group employees or their relatives with the activities or operations of the recipients.

3.4. Respect for Intellectual Property, Confidentiality, and Fair Competition

EFGROUP protects intellectual property in general, specifically that of its clients and its own, and requests respect for these rights from suppliers. The information provided must be used solely to produce products and to preserve their confidentiality. Unfair business practices that violate fair competition are prohibited.

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Recipients must respect the intellectual property rights of the Group and third parties. They must use patents, trademarks, and other intellectual property correctly. Technical and strategic information provided by the Group must remain confidential. The use of such information must cease upon the expiration of the contract or in the event of termination of the assignment, for any reason. Finally, recipients must refrain from any unfair business practices that violate applicable laws on fair competition and antitrust.

3.5. Confidentiality

EFGROUP complies with the European Regulation on the protection of personal data and processes personal data only for legitimate purposes, retaining it for the necessary time. Adequate security measures are adopted to protect personal data from risks of destruction, loss, unauthorized access, or unauthorized processing.

EFGROUP ensures the confidentiality of information and requires recipients to use it only for assigned tasks, to store data accurately and for a suitable period according to specific needs, ensuring that they are kept up to date, and seeking authorization before sharing confidential information with third parties. Recipients may request clarification on the confidential nature of the information.

4. Human Rights, Attention to Workers, and Local Communities

As EFGROUP progresses towards sustainability and social responsibility according to international ESG standards, we place particular importance on management that values Human Rights. This is reflected in the respect for individuals and inclusion, promoting a culture of social responsibility both internally and in interactions with stakeholders.

4.1. Right to Fair and Dignified Work / Prevention of Forced and Child Labor

EFGROUP is committed to ensuring fair and dignified work, prohibiting any form of forced or child labour and adopting a zero-tolerance policy in this regard.

Recipients must respect the rights of workers, avoid forced labour, and ensure free and transparent working conditions. They must respect the legal minimum age for employment and compulsory education.

4.2. Right to Fair Treatment and Remuneration

EFGROUP promotes equal opportunities and respect for individuals at every stage of their career, valuing skills, and professionalism. Suppliers must comply with norms and collective agreements regarding wages and benefits.

Suppliers must ensure adequate and regular wages for their workers, including payments for overtime hours, avoiding excessive working hours, and ensuring voluntary overtime work, as required by law.

4.3. Right to Free Association, Opinion, and Collective Bargaining

EFGROUP supports the right to freedom of association and membership in trade unions to protect the interests of employees.

Suppliers must respect workers' rights to join trade unions and participate in collective bargaining. Employees must be free from intimidation or retaliation for joining unions or participating in collective bargaining.

4.4. Inclusion, Combating Discrimination, and Prohibition of Harassment

EFGROUP rejects all forms of discrimination and promotes equality, condemning any form of abuse or offense.

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Suppliers must not discriminate during hiring or employment and must treat workers with fairness and respect, ensuring equal employment opportunities without discrimination based on race, gender, religion, disability, and other characteristics. The workplace must be free from harassment, abuse, or threats, and there must be no behaviour that limits the personality of employees.

4.5. Health and Safety in the Workplace

EFGROUP is committed to ensuring safe working conditions compliant with health and safety laws, thanks to the ISO 45001:2018 certified Health and Safety Management System adopted.

Suppliers must comply with safety and health regulations in the workplace, providing adequate equipment, effective controls, safe work procedures, and training and programs to ensure worker safety. They must also provide EFGROUP, before each worksite, with signed Operational Safety Plan/DVRS by their employees and collaborators, along with their training certificates. Workers must report workplace injuries without fear of negative consequences.

Suppliers must train workers on emergency, evacuation, and first aid plans. Additionally, workplaces must be equipped to handle emergency situations such as fires. They must also promptly inform EFGROUP about incidents, not only serious or fatal ones during activities but also about any hazards encountered during the worksite.

4.6. Right to Privacy

EFGROUP protects personal data internally and externally, respecting fundamental rights and freedoms and applicable regulations.

Suppliers must comply with privacy laws and personal data processing, protecting the privacy of their workers and respecting their rights regarding personal data in accordance with national and international laws and regulations.

4.7. Community Involvement

EFGROUP promotes social responsibility and economic development in the communities where it operates, considering their needs.

EFGROUP encourages suppliers to collaborate with local communities, contribute to local employment, and adhere to ethical practices. Suppliers are required to align with these values throughout the supply chain and ensure sustainable and inclusive development.

5. Environmental Sustainability and Responsible Management

EFGROUP, certified ISO 14001:2015, is committed to complying with environmental regulations and maintaining environmental management systems, and annually presents its sustainability report. This commitment extends to Suppliers, who are asked to collaborate in preserving the environment along the supply chain, reducing the impact of operations and products.

5.1. Environment and Regulation

- **Compliance with Environmental Regulations**

Suppliers of EFGROUP must comply with current environmental regulations, obtain, and maintain necessary permits, and operate in accordance with our Code of Ethics and company policies for the environment and applicable regulatory and contractual requirements.

- **Responsible Environmental Management**

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Suppliers must manage environmental emergencies with procedures based on risk analysis, commit to reducing environmental impacts through management systems, and collaborate to address challenges along the supply chain.

- **Conservation of Biodiversity**

EFGROUP aims to support sustainable ecosystems and communities through the protection of biodiversity, including land, reforestation, and land management. Suppliers are encouraged to contribute to biodiversity in their products and services.

5.2. Responsible Resource Management

- **Resource Sustainability and Traceability**

Suppliers are required to adhere to regulations in sourcing, production, and distribution, taking into account environmental and social impacts. EFGROUP encourages the use of recyclable, renewable, and local materials for a sustainable economy. Suppliers must ensure product traceability and share data on the production and processing of materials, facilitating EFGROUP's assessment of environmental and social risks.

- **Climate Impact Mitigation**

Elimination or minimization of environmental and climate impact is required through process modifications, material substitution, and sustainable practices. Suppliers should actively reduce energy consumption and greenhouse gas emissions, contributing to global reduction goals.

In the context of a conscious choice in the use of energy resources between renewable and non-renewable sources, Suppliers, upon request by EF Group, must be able to provide data on consumption.

- **Waste Management and Recycling**

Suppliers must comply with laws regarding both hazardous and non-hazardous waste, ensuring their proper management, storage, transportation, and disposal. Differentiation, recycling, and reuse of materials are promoted. Activities potentially harmful to human health or the environment must be managed, measured, and controlled before releasing substances into the environment.

- **Safe Use of Chemical Substances**

Suppliers must prevent accidental leaks and spills. They must comply with international, EU, national, and local regulations regarding hazardous substances. The use of harmful substances is prohibited.

6. Monitoring and Compliance / Implementation and Enforcement Mechanisms

6.1. Monitoring and Control Activities

Suppliers of EFGROUP must maintain compliance with the Code of Conduct, documenting adherence and reporting any non-compliance along with related corrections. Transparency is crucial, without concealing critical issues. EFGROUP may conduct audits, checks, and inspections directly or through third parties, collaborating with Suppliers. Confidentiality of information is ensured. EFGROUP's suppliers commit to collaborate in good faith, monitor their own suppliers, and manage non-compliance. In the event of inability to comply, they must inform EFGROUP.

6.2. Management of Non-Conformity Cases

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In the event of non-compliance (reported or detected during inspections or on-site), EFGROUP firstly requires the supplier to plan and implement necessary corrective actions and encourages the communication of improvements to company practices to achieve compliance. Suppliers must never conceal any critical issues or invoke ignorance to justify areas of non-compliance.

In the event of non-compliance, EFGROUP reserves the right to request recipients to take corrective measures, collaborating in the process of identifying and adopting improvement actions. Suppliers must ensure the effective management of any non-compliance without additional costs beyond what is defined in the contract. Failure to implement corrective measures or persistent non-compliance with the Code may result in early termination of the contract and exclusion of the supplier from the Vendor List. Additionally, EFGROUP may seek damages if applicable.

6.3. Reporting Violations and Contact References

In the event of a violation of this Code, EFGROUP encourages suppliers and anyone who has noticed a violation to report it via email whistleblowing@ef-group.net, to ensuring the confidentiality of the reporter's identity. EFGROUP prohibits any form of retaliation, discrimination, or penalization against reporters and ensures the confidential management of received reports.

7. ACCEPTANCE FORM

By signing this form, the recipient confirms:

- to have received, analysed, and understood the provisions of the Code;
- to commit to complying with the Code and with applicable laws and regulations at the local, regional, and national levels regarding the location of their operations;
- to inform, by all necessary means, their employees, suppliers, external collaborators, and other parties involved in the supply chain for EFGROUP, about the contents of this Code, and to ensure that they also comply with its provisions;
- to commit to welcoming and gradually implementing the encouragements outlined in the Code, with a view to continuous improvement and sustainable development of business activities;
- to accept the monitoring methods outlined within the document;
- to commit, in the event of non-compliance, to implementing the necessary actions to adapt their activities and operations, as indicated in the document;
- to commit to reporting to the Group any suspected or confirmed case of violation of this Code using the reference contacts indicated in the document.

For acceptance

Company:

VAT Number:

Legal Representative:

Name and surname of the person responsible for communicating and supervising compliance with the provisions:

.....

Signature:

Date:

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