



SUPPLIERS' CODE OF CONDUCT

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SUSTAINABILITY FOR ITINERA S.P.A.

Itinera S.p.A. (hereinafter "Itinera" or the "Company"), aware of the importance that sustainability has for the definition of corporate strategies, undertakes to operate, in accordance with the sustainability policy of its Group, in a responsible and transparent way, incorporating sustainability themes within its organization and strategy.

Within its activities, Itinera focuses on themes connected with fight against corruption, quality of materials, promptness of the services rendered, respect of human rights and protection of health, safety and environment.

Itinera recognizes the importance of granting a transparent procurement process and it selects and manages relations with its suppliers in accordance with principles of transparency, correctness and impartiality, avoiding any conflict of interests situations - even potential -, in full compliance with Procedure no. 06 of its Integrated Management System and Supply Procedure.

PURPOSES

In order to ensure an always greater relevance to the principles which inspire the selection and evaluation of its suppliers, Itinera has adopted this Supplier's Code of Conduct (hereinafter the "Code"), the acceptance of which is mandatory for the suppliers to be qualified in the Company's Supply Register and, therefore, be able to have commercial relationships with the same.

Through this Code Itinera aims at involving its suppliers in the creation of a procurement process sustainable from a social, environmental and economic point of view.

The Code applies together with the principles of the Code of Ethics and of Conduct adopted by the Company.

FIELD OF APPLICATION

This Code applies to every subject, person or legal entity, which supplies activities, goods or services in favour of the Company.

Each supplier must ensure that its employers and sub-suppliers are informed about the principles of the Code and that comply with its application.

PRINCIPLES

1. ETHIC

Integrity

The supplier must carry on its corporate activity complying with ethics and integrities principles set forth by the Company's Code of Ethics and of Conduct, in order to maintain lasting, honest and transparent relationships with Itinera.

Anti-corruption

The supplier must refrain from any form of corruption, active or passive, and /or of extortion and must not promise, offer or accept advantages and/or benefits undue and/or improper of any kind, having corruptive purposes.

Unfair competition

The supplier must carry on its corporate activity complying with the rules of a fair and loyal competition, in accordance with the applicable law.

Data protection

The Supplier must comply with the applicable legislation on data protection, adopting all security measure capable to ensure the confidentiality of information of which it has knowledge due to its activities, ensuring as well that all its employees and collaborators abide by such rules.



Reporting of suspect irregularities

The supplier undertakes to provide its employees with suitable means and tools, also IT tools, to report possible suspect irregularities or activities or behaviours potentially unlawful and/or illegal in the workplace. Every report of this kind shall be considered as strictly confidential and treated as such by the supplier, which undertakes, as well, to protect the whistleblowing employees from any form of retaliation.

2. LABOUR

Illegal Labour and Child Labour

The supplier must ensure the utmost respect for people and comply with the applicable labour law, refraining from any form of illegal labour, be it forced or child labour.

Workers' Freedom - Freedom of association - Collective agreements

The supplier must ensure to its employees the right of freedom of association and the application of collective agreements of the filed under reference, in compliance with all applicable laws and regulations.

Working conditions

The suppliers is obliged to ensure to its employees working conditions which respect human dignity, in compliance with the applicable legislation concerning working hours (or working time), overtime hours, payment and social security, permits, holidays and sickness. Moreover, the supplier undertakes to provide to its employees training and instructions opportunities and to ensure a working environment compliant with health and safety requirements provided for by the applicable law.

Diversity and equal opportunities

Fair treatment of all employees shall be one of the fundamental principles of the Supplier's policy and corporate decisions. The Supplier therefore must promote it, ensuring that in the working place there is no form of discrimination in relation to sex, race, religion, age, disability, sexual preference, nationality, social origin, membership of a trade union or other unlawful criteria. The supplier shall ensure that its employees do not suffer any kind of harassment, promoting an inclusive working environment, characterized by integration and support.

3. QUALITY, HEALTH, SAFETY AND ENVIRONMENT

Health and Safety at Work

The supplier undertakes to protect its employees and collaborators from risks in the workplace, adopting all precautionary measures necessary to guarantee their health and safety. Moreover, the Supplier shall provide training and give instructions necessary to ensure that its employees and collaborators are aware of the risks connected with their work activities and ensure adequate controls, safety procedures, preventive maintenance and technical prevention measures to limit risks for health and safety in the workplace.

Quality

The supplier shall respect quality and safety principles and requisites provided for by applicable law as well as respect the Company's quality standards, in order to provide products and services capable to adequately satisfy this latter requests.

Management of Emergencies and Risks

The supplier shall manage the emergencies and risks connected with its corporate activity promoting the implementation of detection systems, prevention and management practices, responses procedures and adequate training, in order to limit the exposure of its employees and collaborators to possible risks.

Efficient use and preservation of resources - Climate protection

The supplier shall use in a responsible and efficient manner all resources involved in the production process, and utilize sustainable source of supply and, wherever possible, to use energy from renewable sources.

The negative impact on environment and climate shall be reduced or eliminated by practices such as the modification of production and maintenance practices as well as the substitution, storage, recycling and reuse of materials.

Waste and emissions

All the activities, which may have potential negative impact on people's health and/or on environment, shall be adequately managed, measured, verified and treated before release of any possible substance in the environment. The supplier, therefore, must monitor and control the impacts of its corporate activity on the territory and comply with legal requirements both for the management of waste - granting, whether possible, the recycling, recovery and/or reuse or disposal in adequate sites - and for water consumption, adopting measures for a conscious management. Moreover, the supplier undertakes to adopt prevention systems to prevent or limit emissions of greenhouse gas and/or discharges of pollutants (in the atmosphere and in sea, superficial or under earth waters) in order to limit the environmental impact of its activity.

Safety of Products and Processes

The supplier must adopt safety programs to manage and maintain all production processes in accordance with the applicable safety standards and deal with the possible impact of the products during the whole production process.

4. COMPANY'S MANAGEMENT SYSTEMS

Documentation

The supplier shall draft and keep updated the documentations provided for by the law, regarding its production process and its corporate activities.

Training and competence

The supplier shall adopt all training initiatives suitable to provide to its managers, employees and collaborators an adequate level of knowledge and comprehension of this Code's content.

Continuous improvement

The supplier shall continuously improve its performance from a sustainability point of view, adopting every adequate measure to the above aim.