



Supplier Code of Ethics

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1. Introduction

The Snam Group (hereinafter also the "Group") is one of the world's leading energy infrastructure companies and is committed to carrying out its activities with the aim of promoting the energy transition towards forms of resource and energy use that are compatible with environmental protection and progressive decarbonisation.

The Snam Group bases its development model on compliance with the law and the principles of integrity, fairness, transparency and loyalty, in line with the values of sustainable development, respect for human rights, diversity and inclusion, protection of the environment, safety, health of workers, equality and impartiality, and the fight against corruption;

A shared culture of legality and business ethics along the supply chain is an essential element of sustainable global development, of which each market player must see itself as an integral part.

The Snam Group therefore promotes its business activities by creating long-term value in the supply chain for the benefit of shareholders and the community, taking into account the interests of other relevant stakeholders. To this end, the Snam Group promotes business relations with Suppliers and, more generally, with external collaborators of appropriate professionalism, who respect and share the principles of legality and the ethical culture of the Group, the contents of which are set out in this document.

This document therefore constitutes the set of values that characterise the ethical business culture that must inspire the strategic thinking and the conduct of the business activities of the Snam Group and of all the Suppliers that have or intend to have relations with it.



2. Scope and purpose

The Snam Group considers as recipients of this document the Suppliers, external collaborators and companies that, individually or as part of a group, provide goods, services, works and resources necessary for carrying out activities and providing services (hereinafter "Suppliers" or individually "Supplier").

This document recalls the set of principles, values and rules of behaviour enshrined in Snam's Code of Ethics and in the guidelines adopted by the Group's companies, which must inspire relations with all the parties with which they have dealings, among which Suppliers, as strategic partners in the development process, are particularly important.

Suppliers are responsible for ensuring that the principles and rules of conduct set out herein underpin their actions and inspire those of third parties with whom they work, and for promoting their dissemination and compliance through specific contractual clauses. Suppliers therefore undertake to ensure that all subcontractors/sub-suppliers used in relations with the Snam Group share and accept the principles contained herein.

For this reason, the Supplier Code of Ethics is brought to the attention of all those who wish to establish and maintain direct or indirect business relations with the Snam Group¹.

3. General standards of conduct for Suppliers

Risk assessment and management are considered paramount to the achievement of business objectives. Therefore, the relationship with Suppliers is characterised by compliance with current regulations and the principles of this Code, taking into account the highest professional standards, best practices in ethics, health and safety, free competition and respect for the environment.

The Group promotes the sharing of the principles and content of this Code with its Suppliers and external collaborators and requires them to share and respect these principles and, in turn, to promote them with their own Suppliers, subcontractors and sub-subcontractors.

In this context, the Group undertakes to: *(i)* develop lasting and cooperative relationships with Suppliers in accordance with good business practice and the principles of transparency and cooperation; *(ii)* monitor the protection of the health and safety of the employees of companies involved in its supplies, in accordance with legal and contractual provisions; *(iii)* include in contracts the provision of ad hoc clauses concerning Suppliers' adherence to and compliance with the ethical principles that inspire the Snam Group's activities; *(iv)* observe and require compliance with the contractual terms and conditions. Supplier qualification and accreditation procedures – based on objective and verifiable reference elements – take into account, among other things, technical capacity, compliance with required quality standards and reputation.

For the Snam Group, the selection and qualification of Suppliers, as well as the procurement of goods, works or services, are based on objectivity and fairness, are carried

¹ You can consult the Code of Ethics by clicking on the following link: <https://fornitori.snam.it/snam/it/home>.



out in accordance with specific rules and procedures and do not exclude any person possessing the necessary qualifications from access to the qualification process.

Compliance with and sharing of the principles contained therein and the signing of the “Ethics and Integrity Agreement” by Suppliers and subcontractors, to which reference is made, are essential conditions for access to Snam’s Vendor List, for maintaining the status of “Qualified/Accredited Supplier”, for participating in selection and/or award procedures, for entering into contracts and for the entire duration of the contractual relationship.

The Supplier concerned acknowledges and accepts that these principles are an integral and essential part of any relationship with the Snam Group and constitute obligations (of protection and performance), the fulfilment of which it is specifically required to comply with.

The Group’s People² ensure that the requirements of these Suppliers correspond over time to those required by the company’s procedures and qualification systems.

The continuity of business relationships with Suppliers is therefore also influenced by the maintenance of behaviour by these parties in line with the principles contained in this document. Suppliers must always be able to provide information on their social and environmental policies in relation to the contracts they receive.

3.1. Compliance with regulations

Suppliers are required to comply with all national, European Union and international implementing rules and regulations in force in the countries in which they operate, and to take all necessary measures to keep themselves informed and to comply with regulatory developments.

Transparency, honesty, fairness and good faith are general principles that guide the Group’s actions. In carrying out their activities, Suppliers shall act fairly and impartially, in full compliance with the principles and content described herein, particularly in situations where a conflict of interest may arise.

Suppliers must therefore immediately report any situation that may constitute or give rise to a conflict of interest, even if only a potential one, that could affect the proper conduct of relations with the Group.

3.2. Respect for human rights

The Snam Group promotes the protection of the dignity, freedom and well-being of the people who work or collaborate with it, in order to create a corporate culture that ensures inclusion, fairness and diversity. Suppliers are therefore required to act in accordance with national laws and regulations, as well as international conventions and agreements, concerning the respect of such personal rights.

In particular, Suppliers are expected to respect and protect universally recognised human rights, to promote the development of a compliant working environment and to undertake not to discriminate in any way, including in relation to: race, colour, gender,

² Reference to the definition in the Snam Code of Ethics.



sexual orientation, disability, pathology, religion, political opinion, nationality or social origin, age, migrant status, genetic predisposition and lifestyle, towards all those with whom they work; they are also required to act in accordance with the principles set out in international conventions, in particular the United Nations Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation and the United Nations Global Compact, as well as the United Nations Guiding Principles on Business and Human Rights.

The Suppliers undertake to establish labour relations that are respectful of the relevant regulatory and contractual framework, guaranteeing their workers equal employment opportunities and ensuring that everyone can enjoy fair regulatory and remuneration treatment based on criteria of merit and competence. The Recipients also guarantee the right of workers to freely form trade union associations and to recognise the right to collective bargaining, maintaining a responsible and constructive dialogue with the relevant trade union organisations in order to establish a climate of mutual respect and collaboration.

Furthermore, Suppliers shall refrain from engaging in any form of: *(i)* abusive exploitation of workers, including forced and compulsory labour and any other form of mental or physical coercion; *(ii)* child labour prohibited under current legislation regarding the minimum age to work; *(iii)* irregular employment.

Suppliers undertake to prevent attitudes that do not comply with the principles set out above, as well as undertaking to oppose any form of intimidation, violence and harassment.

To this end, the Group undertakes, in its relations with Suppliers, to work only with those who share the above values and principles and to formalise, in the relevant agreements, contractual clauses requiring compliance with this common approach.

3.3 Fighting Corruption

The Group promotes a zero-tolerance approach to all forms of corruption and urges its Suppliers to adopt codes of conduct aimed at combating corrupt practices, including those that may indirectly involve persons working for them, and to comply with the relevant national and international regulations in force.

Suppliers shall not engage in or tolerate any form of corruption, either generally in the course of their business or specifically to obtain contracts or subcontracts.

In their relations with the public administration, Suppliers must inspire and align their behaviour with the principles of fairness and honesty. Persons involved in negotiations, requests or institutional relations with the public administration may not, for any reason, seek to improperly influence its decisions or engage in unlawful conduct, such as the offer of money or other benefits, which may influence the impartial judgement of the public administration representative.

Suppliers must also refrain from any form of unlawful intermediation with a public official or a person in charge of a public service and, in general, from any other conduct conducive to the commission of acts of corruption.



No form of gratuity is permitted which may be construed as exceeding normal business or courtesy practices, or which is otherwise designed to exert undue influence and obtain favourable treatment in the conduct of any business connected with the Group. This prohibition applies to gifts promised or offered as well as those received, a gift being any kind of benefit. Suppliers shall refrain from practices that are prohibited by law, trade custom or the codes of ethics of the companies or entities with which they do business.

Suppliers also undertake to provide complete, accurate and truthful information in order to obtain public grants, subsidies or funding, even if the value and/or amount is small. Such contributions, grants or financing must be used for the purposes for which they were requested and granted.

The Suppliers, recipients of this Code, undertake to comply with the provisions issued by the competent institutions or public regulatory authorities for the purpose of complying with the regulations in force in the sectors related to their respective areas of activity, as well as to comply with any request made by the same, offering full cooperation when requested and avoiding obstructive behaviour.

The measures to prevent and combat corruption shall be known or, in any case, made known through appropriate means of information to all those who work with the Supplier.

3.4. Occupational health and safety protection

Suppliers are required to comply with the obligations set out in the legislation in force in the countries in which they operate and to organise their workplaces in such a way as to ensure the protection of the mental and physical health and safety of employees, third parties and local communities.

Suppliers shall endeavour to adopt an appropriate system of rules for their own assessment, management, monitoring and prevention of risks, as well as appropriate measures to ensure continuous improvement of safety levels.

These preventive measures are known or at least available through appropriate information channels to all those who work or otherwise cooperate with the Supplier. Suppliers shall ensure an adequate level of information and specific training on occupational health and safety for their employees.

To this end, Suppliers undertake to select and work with third parties who share this approach. Suppliers are also required to take steps to include specific clauses requiring third parties to comply with environmental and health and safety principles when formalising the relevant relationships.

3.5. Sustainability, protection of the environment and ecosystems

The Snam Group promotes the protection and preservation of the quality of the environment, the sharing and rational use of natural resources and the protection of the health and safety of its workers in the workplace.

Particular attention is also paid to scientific and technological development aimed at protecting the environment and reducing its ecological footprint, inspired by criteria of energy efficiency and resource optimisation.



Suppliers are required to conduct their activities in accordance with the national laws and regulations of the countries in which they operate, as well as applicable international agreements and standards.

Suppliers undertake to operate in compliance with the applicable laws and administrative authorisations on environmental protection, prevention of pollution of all environmental matrices (including air pollution) and waste management (whether solid or liquid).

Suppliers conduct their activities with an awareness of their responsibilities to the communities in which they operate.

As part of their activities, Suppliers shall promote research and innovation activities by encouraging the adoption of solutions and technologies that are consistent with the development of sustainable business policies. The Group requires its Suppliers to respect the cultural, economic and social rights of these communities and encourages Suppliers to adopt policies and practices that meet the needs of these communities.

Suppliers must commit to reducing the environmental impact of their operations, such as the production and delivery of their services throughout their life cycle, through the efficient and responsible use of natural resources, proper waste management including recycling, the reduction of emissions including greenhouse gases, the reduction of energy consumption and the preference for the use of energy from renewable sources. Within the framework of their activities, Suppliers undertake to adopt measures to respect biodiversity and ecosystems, with the aim of reducing deforestation and supporting their conservation, including by adopting appropriate measures to prevent environmental damage. These measures shall include a risk assessment, management, monitoring and prevention system appropriate to the activities carried out and shall avoid impacts on significant ecosystems to the extent possible and by not operating in biodiversity-rich areas.

Suppliers shall encourage the workforce as a whole to promote responsible behaviour that ensures environmental protection through the sustainable use of resources, energy efficiency and responsible waste management by applying the reuse, recycling and reduction of any waste produced, wherever possible.

Suppliers shall provide adequate communication, training and information to their employees and those with whom they work in various capacities.

3.6. Transparency, fair competition and market information

The Group promotes fair and sustainable competition among its Suppliers, based on clear and transparent procurement procedures, applying the principles of the European Union (transparency, non-discrimination, free competition).

Suppliers are required not to engage in conduct that violates the principles of fair competition and to comply with all applicable antitrust laws.

However, under no circumstances shall Suppliers favour or permit stakeholders, employees or, more generally, persons working for them to behave in a manner that facilitates market abuse or market distortion.



3.7. Privacy, Information & Cyber Security

The Group is committed to protecting the personal data of its employees and of third parties collected or processed in the context of business relationships and to avoiding any unlawful processing in accordance with the principles of fairness, minimisation, accuracy, integrity and confidentiality. It also ensures adequate cybersecurity safeguards through processes and technologies adopted in accordance with recognised standards and international best practice.

Suppliers, in turn, are obliged to ensure that the processing of personal data carried out within their facilities is carried out in respect of the fundamental rights and freedoms, as well as the dignity of the persons concerned, as provided for by the applicable legal provisions.

Where, in the context of the business relationship, Suppliers are required to process personal data for which the Group is the data controller, Suppliers are required to comply with the prescriptive provisions set out in the act of appointment as data controller pursuant to Article 28 of the GDPR, by identifying and implementing appropriate and preventive security measures, both technical and organisational, to ensure an adequate level of security, avoiding risks of destruction and loss or unauthorised access or processing.

Suppliers are required to maintain the utmost confidentiality and integrity of documents, news and information obtained in the performance of their duties or otherwise in connection therewith, which are not subject to transparency in accordance with laws and regulations and the use of which may cause danger or damage to the company and/or undue profit to themselves or others.

They are committed to ensuring the appropriate use of the Group's information and compliance with security requirements aimed at protecting the confidentiality, integrity and availability of the Group's information assets.

Suppliers, in turn, implement processes and technologies to mitigate cyber security risks according to risk analysis criteria and countermeasures consistent with their business setup.

Suppliers also comply with contractually agreed security measures.

In the event of a cyber security incident that has even a potential impact on the Group's information or technology systems, Suppliers shall immediately inform the Group, update it on the measures taken and establish cooperation to mitigate the impact of the incident. Information, knowledge and data relating to the Group's activities and concerning the Group are proprietary to the Group and may not be used, communicated or disclosed unless expressly authorised in writing by the Group or the relevant authorities.

3.8. Accounting control and transparency

Suppliers undertake to refrain from any conduct, whether active or by omission, which directly or indirectly contravenes the regulatory principles and/or internal procedures relating to the preparation of accounting documents and their external presentation. In particular, the Suppliers, recipients of this Code, undertake to cooperate to ensure that each operation and transaction is promptly and correctly recorded in their respective



accounting systems, in accordance with the criteria established by law and applicable accounting principles.

Suppliers, as well as persons who, in any capacity, are involved in the preparation of accounting documents, shall be responsible for verifying and guaranteeing the accuracy of the data and information provided.

Anyone who becomes aware of possible omissions or falsifications in the preparation or keeping of accounts or any other corporate communication, or in any case of violations of the principles laid down in this document, in the guidelines and in the procedures of each Supplier, must report them immediately to the relevant Functions of the Group.

4. Dissemination

No claim to act in the interest of the Snam Group or of the Suppliers themselves justifies the adoption of behaviour contrary to the aforementioned principles, values and rules of conduct.

In order to prevent conduct in violation of the internal protocols and reference regulations, Suppliers shall endeavour to disseminate and raise awareness of the law, the Supplier Code of Ethics and the additional rules of conduct and prevention and control protocols adopted within each company, promoting appropriate information and training initiatives for their own personnel and third parties.