



ETHICS CHART

MAY 2024

Energy to inspire the world



CONTENTS

01



Things to know

- Things to Know as a Reader
- Things to Know as a Manager

02



Our Principals

03



Focus

- Human Rights
- Health and safety
- Ethics and Integrity
- Whistleblowing
- Environment and Sustainability
- Global Security

04



Integrity Road Map

Things to Know as a Reader

The Code of Ethics represents the set of values that must inspire the actions of all Snam People

“Snam’s people” are: the directors, statutory auditors, *management*, employees of Snam and all those who work to achieve Snam’s objectives, each within the scope of their functions and responsibilities.

If in doubt, be sure to ask your manager or contact the **IntegrityLine** (integrityline@snam.it)

Things to Know as a Manager

At Snam, *managers* promote a culture of integrity by seeking to be a model for their *teams*, inspiring and directing their conduct to the Code of Ethics.

Managers must encourage an open dialogue based on honesty and respect for the values set out in the Code of Ethics within their *teams*.



Our Principals

Human Rights

Working with Integrity

Environment
and Sustainability

Health and Safety

Whistleblowing

Global Security

External Sources



The United Nations Global Compact

The *Global Compact* is a voluntary initiative to which companies that share, support and apply a set of fundamental principles relating to human rights, labour standards, environmental protection and anti-corruption are invited to sign an 'Annual Communication' on actions implemented and results achieved.



The International Labour Organization (ILO)

The International Labour Organisation is a United Nations agency that is responsible for preparing international conventions and standards to promote labour rights and improve social protection systems and strengthen dialogue on labour issues.



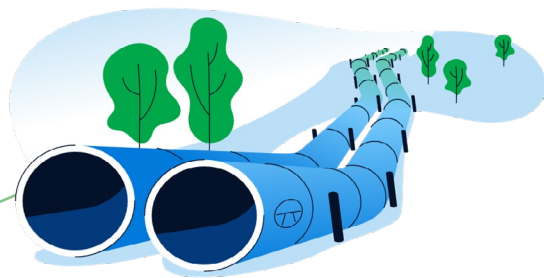
The UN Guiding Principles on Business and Human Rights

In 2011, the Human Rights Council endorsed a set of principles clarifying the roles and responsibilities of states and companies with regard to human rights.



The OECD Guidelines for Multinational Enterprises

The Organisation for Economic Co-operation and Development's guidelines provide recommendations for responsible business conduct on issues of employment and industrial relations, human rights, environment, disclosure of information, anti-corruption, competition and taxation. They have been revised several times since they were first adopted in 1976.



Human Rights

Snam promotes the protection of the dignity, freedom and well-being of the people who work or collaborate with the company, and who are part of the “chain of activities”.

Snam acts in compliance with domestic and international laws and is committed to upholding human rights and repudiates all forms of discrimination against all those with whom it cooperates, and promotes policies to respect and protect the aforementioned rights of individuals and in social groups.

Snam is committed to creating an inclusive, fair and *diversity-enhancing* corporate culture.



 **SUSTAINABLE DEVELOPMENT GOALS**

| | | | | | |
|--|---|---|---|---|---|
| 1 NO POVERTY  | 2 ZERO HUNGER  | 3 GOOD HEALTH AND WELL-BEING  | 4 QUALITY EDUCATION  | 5 GENDER EQUALITY  | 6 CLEAN WATER AND SANITATION  |
| 7 AFFORDABLE AND CLEAN ENERGY  | 8 DECENT WORK AND ECONOMIC GROWTH  | 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE  | 10 REDUCED INEQUALITIES  | 11 SUSTAINABLE CITIES AND COMMUNITIES  | 12 RESPONSIBLE CONSUMPTION AND PRODUCTION  |
| 13 CLIMATE ACTION  | 14 LIFE BELOW WATER  | 15 LIFE ON LAND  | 16 PEACE, JUSTICE AND STRONG INSTITUTIONS  | 17 PARTNERSHIPS FOR THE GOALS  |  |

Human Rights

Snam collaborates with those who share its values and formalizes contractual clauses in its agreements with suppliers, consultants and third parties that require compliance with this shared approach.

Snam repudiates any form of exploitation of labour, including child labour, and violence in all its forms, raising awareness of these rules of conduct among the entire workforce.



How can I contribute?

- Promoting a work environment free of bullying, harassment and violence.
- Respect colleagues, following the guidelines set out in the Code of Ethics.
- Acting in a respectful and non-discriminatory manner towards colleagues, both in person and online.
- Reporting incidents of discrimination.
- Carrying out activities for which one has the competence, professionalism and training.



Health and Safety

Snam organises workplaces that are able to guarantee the protection of the health and safety of workers, third parties and local communities in accordance with current regulations.

Snam selects suppliers and works with third parties who share this approach by including and formalising specific clauses in the relevant relationships.



How can I contribute?

- Know and respect the Snam Group's 10 Golden Safety Rules.
- Carrying out activities for which one has the competence, professionalism and training.
- Follow all safety rules, procedures, standards and work instructions, including emergency preparedness.
- Only use tools, machinery and equipment that you are trained to use.
- Inform your *manager* of the incident so that it is reported.
- Report any physical or psychological conditions that may impede the safe performance of work or activities.

Working with Integrity

Snam repudiates corruption as a means of conducting its business.

Snam operates in accordance with national and international regulations and international conventions.

Corrupt practices and collusive behaviour are contrary to Snam's values only acts of courtesy or gifts of modest value, such that they cannot be construed as actually influencing or compensating an undue act, are permitted.



10 RULES TO STRENGTHEN BUSINESS INTEGRITY ZERO CORRUPTION Goal



How can I contribute?

- Remember that bribes are not always and only in cash; they can also be excessive gifts, hospitality or favours, such as to generate a state of subjugation, which must always be refused and reported in accordance with internal *policies*.
- Do not pay sums of money or payments in violation of internal procedures. Any request for payment not authorised by internal procedures must always be refused and reported.
- Follow the steps described in the *Policies for Due Diligence Screening Processes* to choose suppliers.
- Only accept gifts and hospitality that are in line with internal procedures, appropriate and not addressed to family or friends.
- Report any potential conflicts of interest to your manager so they can be managed.

Whistleblowing

Snam encourages a culture of transparency and has adopted the *Whistleblowing Guideline*.

Staff and third parties may make written or verbal reports of violations of which the reporter has become aware in the context of their work.

Snam has set up internal channels to ensure that the information provided will be treated confidentially.

Contact the external **ANAC** channel only in the case of:

- the internal report was not followed up.
- there are reasonable grounds to believe that the internal report would not be effectively followed up or that it could lead to risks of retaliation.
- there is good reason to believe that the breach may constitute an imminent or obvious danger to the public interest.



How can I contribute?

- Report facts or behaviour that may have a negative impact on the Company on the **IT Platform**.
- Reporting facts or conduct taking into account the presence or absence of a conflict of interest on the **IT Platform**.
- Report behaviour or operational decisions taken contrary to the company's **IT Platform Policy**.



Want to know more? **Visit the link**

Environment and Sustainability

Snam as System Operator

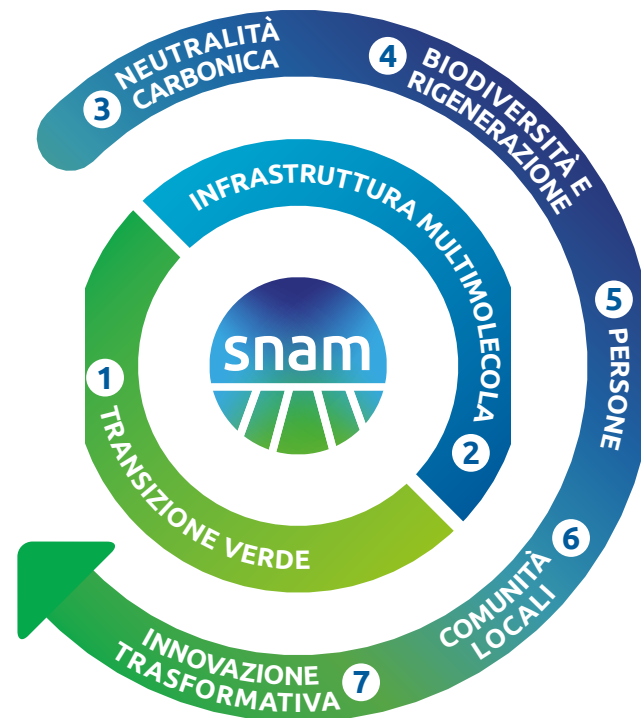
Snam contributes with its infrastructure and platforms to a decarbonised energy system...

- Developing infrastructure for all green molecules.
- Promoting new technologies and *businesses* (CCS, hydrogen) to decarbonise *hard-to-abate sectors*.
- Reducing third-party emissions through our investments in energy efficiency and biomethane.

Snam as a Company

...to become an increasingly sustainable company

- Implementing *carbon neutral infrastructure*.
- Carrying out 'green', sustainable operations in construction and management.
- Promoting a regenerative approach to biodiversity and mitigation in the territories where we operate.
- Supporting development and caring for our people.
- Promoting continuous improvement through innovation.



How can I contribute?

- Support the reduction of the CO₂ footprint by improving the sustainable use of resources, such as energy and water, avoiding or reducing waste.
- Minimising the use of hazardous substances and preventing emissions in all activities.
- Ensure that all environmental incidents are properly reported and managed.
- Follow company procedures for waste disposal.

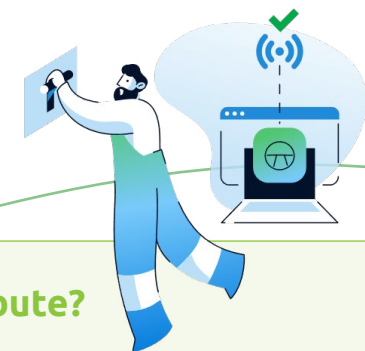
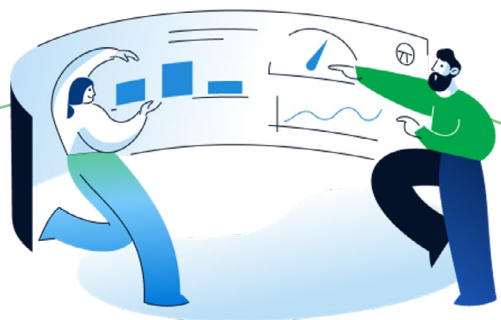


Global Security

Snam ensures an adequate level of security and protection of people, *assets*, data and information from cyber threats.

Snam promotes the lawful processing of personal data while respecting the fundamental rights and freedoms of data subjects, as provided for by current legislation and the GDPR, by adopting appropriate corporate procedures.

Snam invites you to maintain the utmost confidentiality on documents, news and information acquired in the performance of your duties.

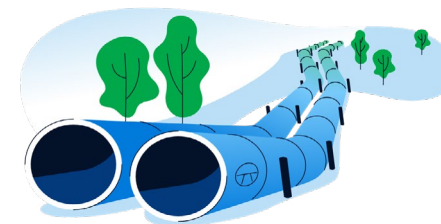


How can I contribute?

- Any online activity must be carried out with respectful and honest intentions.
- Protect Snam's confidential information, including intellectual property, business secrets and other sensitive activities or information.
- Only use tools and software approved and supplied by Snam.
- Do not download and do not use unlicensed tools and software from the Internet.
- See the Policy on the Ethical Use of *Artificial Intelligence*.

Integrity Road Map

Are you still in doubt?
Follow the path designed for you!



01 Are your actions contrary to Snam's Code of Ethics or Internal Rules?

NO It would appear that you are doing nothing wrong.

02 Would explaining your actions to colleagues and friends be a problem?

NO It would appear that you are doing nothing wrong.

03 Would you be worried if your actions were in the public domain?

NO It would appear that you are doing nothing wrong.

04 If all your colleagues behaved as you do, would that harm Snam?

NO It would appear that you are doing nothing wrong. GO AHEAD!

YES/MORE This could have serious consequences, **don't do it!**
In case of doubt, write to the **IntegrityLine** (integrityline@snam.it)

