



SUSTAINABLE PROCUREMENT POLICY

INDEX

1. Purpose and Objectives of the Policy	3
2. Scope of Application	3
3. SICIT Group's Approach to Sustainable Procurement	3
4. Relevant Regulations and Standards	4
5. Principles of Conduct.....	5
5.1. Legal Compliance.....	5
5.2. Human Rights and Decent Working Conditions	5
5.3. Prohibition of Corruption	5
5.4. Fair Competition.....	5
5.5. Product Safety and Quality	5
5.7. Prevention and Reduction of Pollution and of Environmental Emissions	6
6. Reporting	6
7. Implementation and Monitoring.....	6
8. Review, Communication and Training.....	7

1. Purpose and Objectives of the Policy

This Policy reflects the philosophy of SICIT Group S.p.A. ("SICIT") and its subsidiaries and affiliates (collectively, "SICIT Group") and aims to provide a structured framework for promoting responsible and sustainable procurement practices in support of the company's strategic objectives and in alignment with the values expressed in the Group's Code of Ethics.

Specifically, this Policy establishes the principles and guidelines designed to foster continuous improvement in the sustainability of SICIT's value chain, in compliance with applicable legislation. It aims to build a procurement system that considers not only economic aspects but also environmental, social, and governance (ESG) issues in the sourcing of goods and services.

2. Scope of Application

This Policy sets out the principles and standards for sustainable procurement that apply to all companies within the SICIT Group.

In particular, it applies to directors and all individuals working for or collaborating with SICIT Group at every level and in any capacity: managers, supervisors, employees (whether permanent, fixed term, or temporary), interns, seconded staff, remote workers, occasional workers, and volunteers, regardless of their location.

The Policy also applies to agents, suppliers, business partners, consultants, contractors, and any other third parties engaged by the Group.

All of the aforementioned parties are required to be fully aware of the content of this Policy and to avoid any actions or behaviours that could directly or indirectly involve the Group companies in violations of this Policy or of applicable laws.

While exercising its direction and coordination activities, SICIT Group respects the operational autonomy of each controlled or affiliated company, while maintaining overall governance and supervision in line with the legitimate interests of both majority and minority shareholders, and in compliance with applicable local laws and confidentiality requirements.

3. SICIT Group's Approach to Sustainable Procurement

For SICIT Group, sustainability means anticipating and managing current and future risks and opportunities across economic, social, and environmental dimensions. This approach provides a competitive advantage and supports the creation of long-term value for shareholders and stakeholders alike.

SICIT Group actively implements measures to develop a sustainable procurement system by integrating and evaluating environmental, social, and governance (ESG) factors in the selection and monitoring of its suppliers.

In line with this vision, SICIT Group sources raw materials and semi-finished products from suppliers who are selected, assessed, and monitored based on the following criteria:

- **Reliability:** understood both as competence and capacity in supplying goods and services, as well as financial stability and potential reputational or legal non-compliance risks.
- **Product and/or service quality:** referring to technical specifications, delivery times, and other qualitative standards. Supplier selection is based on the technical, qualitative, and quantitative

requirements of the products purchased to ensure high-quality standards.

- **Price and value for money:** to ensure fair and competitive conditions while avoiding favouritism or discrimination.
- **Commitment to responsible practices:** including the environmental and climate impact of their operations, respect for human rights, health and safety, working conditions, and fair payment practices—particularly toward small and medium-sized enterprises.

One of SICIT Group’s main objectives through sustainable procurement practices is to build strong, long-term relationships with its suppliers, thereby reinforcing its commitment to a responsible supply chain for the benefit of its stakeholders.

For this reason, SICIT Group rejects and condemns any unlawful or unethical conduct—including by its suppliers—such as any form of corruption or violation of applicable laws. The Group is actively committed to developing a transparent, responsible, and sustainable value chain.

SICIT Group has set the goal of aligning 100% of its strategic suppliers with its Supplier Code of Conduct by 2030.

This Policy, consistent with the Group’s Code of Ethics and internal regulatory framework, expresses in a structured and integrated way SICIT Group’s vision for the development of sustainable procurement across its business operations.

4. Relevant Regulations and Standards

In carrying out its procurement activities, SICIT Group is committed to applying and promoting the following principles and reference standards among its suppliers:

- **UNIDO and Sustainable Supply Chain (2023):** guidelines from the United Nations Industrial Development Organization outlining global principles for working with partners and stakeholders to promote supply chains that benefit people and the planet.
- **The 2030 Agenda for Sustainable Development:** a global action plan to eradicate poverty, ensure prosperity and peace, and protect the planet, aligned with the broader framework of initiatives to limit global warming and reflecting the principles and values on which the European Union is founded.
- **SICIT Group’s Code of Ethics.**

Drawing from the principles of the **United Nations Global Compact**, SICIT Group bases its supply chain management on the following three key factors:

1. **Reducing sustainability-related risks**, such as supply chain disruptions or delays, or reputational damage stemming from suppliers’ practices in areas such as human rights, labor standards, environmental protection, and anti-corruption. These efforts help preserve brand value and meet investor expectations.
2. **Enhancing productivity through sustainability**, by increasing operational efficiency and reducing waste in raw materials, transportation, and energy consumption.
3. **Driving sustainable growth**, by enabling all supply chain actors to foster innovation and respond effectively to evolving customer needs.

5. Principles of Conduct

In relation to the development of a sustainable procurement system, SICIT Group ensures that its business activities are guided by the principles set out in this section. These principles are foundational to the Group's culture and corporate strategy, and their ongoing monitoring is essential to prevent violations and ensure the effectiveness of the adopted measures:

5.1. Legal Compliance

SICIT Group requires full compliance with all applicable laws throughout the conduct of its business activities and expects all individuals and entities engaged in a working and/or commercial relationship with the Group to act in accordance with relevant laws and regulations.

5.2. Human Rights and Decent Working Conditions

Human rights are the inalienable rights of every individual, recognized by virtue of being human—regardless of origin, background, or location.

SICIT Group does not tolerate and strongly condemns any violation of these rights, and in particular, it rejects the use of forced labour, child labour, or any such practices by its suppliers and business partners.

Respect for human rights is considered a fundamental requirement for maintaining a transparent relationship with SICIT Group and for supporting sustainable progress that goes beyond mere legal compliance.

SICIT Group promotes social responsibility toward its employees and ensures fair and adequate wages and working hours.

The Group also expects its suppliers and business partners to provide their employees with the same conditions.

5.3. Prohibition of Corruption

SICIT Group does not tolerate any form of corruption, including extortion or the offering/acceptance of unlawful benefits—regardless of whether the proposal is made directly or through intermediaries, and whether it targets private individuals or public officials.

Suppliers and business partners are required to disclose any relevant, actual, or potential conflict of interest that may arise in the course of their activities.

A conflict of interest is defined as any private interest or personal activity that interferes—or could interfere—with a business relationship with SICIT Group.

5.4. Fair Competition

SICIT Group expects its suppliers to operate in full compliance with national and international laws protecting fair competition, including regulations on unfair competition and antitrust laws.

Any agreement with competitors regarding prices, sales terms, quantity restrictions, market allocation, or any other arrangement that may lead to unfair practices is strictly prohibited.

5.5. Product Safety and Quality

SICIT Group's products—and those supplied by its vendors—must not pose a risk to human health or the environment. Accordingly, SICIT Group provides appropriate usage instructions and safety data sheets,

especially for products classified as hazardous under Regulation (EC) No. 1272/2008 (CLP).

To ensure the highest possible standards of safety and quality, the Group involves its suppliers and business partners in the early stages of project development, adopting a preventive and proactive approach that allows potential issues to be anticipated and addressed in advance.

5.6. Responsible Sourcing of Raw Materials

SICIT Group, together with its suppliers and business partners, supports activities that ensure the responsible sourcing of raw materials and firmly condemns the procurement and use of materials obtained unlawfully or through unethical or unreasonable practices.

5.7. Prevention and Reduction of Pollution and of Environmental Emissions

SICIT Group is actively committed to reducing and controlling waste and emissions throughout its production processes. In particular, the Group prioritizes the development of environmentally friendly and sustainable products, aiming to reduce waste and emissions while increasing the use of energy from renewable sources.

This commitment is equally expected of its suppliers and business partners, who are required to contribute to the development of a sustainable supply chain.

Violations of the above rules may expose SICIT Group to serious and irreparable reputational damage, as well as to specific penalties, regardless of the laws and regulations in force in the country where the breach occurred.

In the event of non-compliance or specific violations of the behavioural principles outlined in this Policy by its suppliers or business partners, SICIT Group reserves the right to request corrective measures and/or terminate the business relationship, and to pursue legal action in the event of serious harm.

6. Reporting

SICIT Group encourages anyone who becomes aware of actions or behaviours that violate this Policy—or applicable laws and regulations on sustainable procurement—to file a report.

For activities within Italy, SICIT Group has established a dedicated internal whistleblowing channel to ensure the confidentiality of the information provided and the protection of the whistleblower's identity: Reports can be submitted by filling out the form available on the GLoBaLeaks platform: <https://whistleblowing.sicitgroup.com/#/>

7. Implementation and Monitoring

SICIT Group is committed to assessing the implications of any violations of sustainable procurement practices in connection with its activities.

Given the potential impact of breaches of this Policy, the Group prioritizes actions aimed at identifying, preventing, or mitigating such risks across its value chains.

SICIT Group regularly reviews and updates the progress of its commitments and communicates results annually through its Sustainability Report and other communication tools.

8. Review, Communication and Training

This Policy is subject to periodic review to ensure its continued relevance and effective implementation. Any revision will be submitted to the Board of Directors for approval.

SICIT Group is committed to making this Policy accessible and available to all relevant stakeholders, both within and outside the company, through internal communication channels and publication on the corporate website:

<https://www.sicitgroup.com/policy-di-gruppo/>

The involvement of personnel is considered a key starting point to ensure full implementation of this Policy. For this reason, SICIT Group delivers training programs to promote understanding of the principles set out herein, as well as the applicable legal requirements and the most rigorous internal standards and procedures.

SICIT Group S.p.A.

Chairman

Rino Mastrotto