



CODE OF CONDUCT

SUPPLIERS AND COMMERCIAL PARTNERS

ESG FOCUS

ETHICS AND SUSTAINABILITY FOR AdB

Aeroporto Guglielmo Marconi di Bologna S.p.A. (hereinafter AdB) - listed on the STAR segment of the Italian Stock Exchange managed by Borsa Italiana, Euronext Group - has adopted the Corporate Governance Code, approved by the Corporate Governance Committee in January 2020, which is addressed to all companies with shares listed on the “Mercato Telematico Azionario” managed by Borsa Italiana.

Pursuant to and in accordance with Article 1(1) of the aforementioned Corporate Governance Code, the “board of directors leads the company by pursuing its sustainable success”.

AdB strives for continuous improvement across all of its activities, promoting conduct marked by integrity and environmental, economic and social sustainability, with a particular focus on respecting human rights and diversity, in addition to natural resources.

AdB has therefore put in place and implements a specific Sustainability Plan, covering the range of ESG areas and which is based on and seeks to achieve the following objectives: the promotion of a culture of sustainability, the improvement of workers' health and safety conditions, quality of life and the well-being of the surrounding community, the creation of a safe and inclusive work environment, the creation of new job opportunities, and the promotion of dialogue with citizens, local partners and all stakeholders.

Ethics and Sustainability are closely and inextricably interconnected and are indispensable elements for a responsible company striving to combine the needs of efficiency and profitability, people's well-being and sustainable development. Indeed, in order for Sustainability not to succumb to temptations of greenwashing, Ethics plays a primary and fundamental role in the credibility of the commitment made in the processes and projects seeking to integrate ESG objectives within the business and strategic and economic-financial plans of enterprises.

AdB also focuses on promoting these values within its supply chain and, in particular, among its most long-standing and significant Suppliers and Commercial Partners. In fact, it is fundamental for AdB that its Suppliers and Commercial Partners share the same ethical and sustainability values, with a view to partnership, and the commitment to the sustainable development of "Guglielmo Marconi" airport, in terms of all the activities and services carried out at Bologna airport.

This **Code of Conduct** therefore, as an integral tool for implementing AdB's social responsibility policies, together with the Code of Ethics, the Organisation, management and control model pursuant to Legislative Decree No. 231/01 and the Anti-Corruption Policy, sets out the fundamental ethical and conduct principles - as well as the business and operational rules of conduct - that AdB expects its Suppliers and Commercial Partners to adhere to for the responsible, ethical, compliant, and sustainable management of its business; this in full compliance and adherence - and not merely in a formal sense - with the values, principles and standards that AdB applies to its business and public service activities.

PURPOSE AND SCOPE OF THE CODE OF CONDUCT FOR AdB'S SUPPLIERS AND COMMERCIAL PARTNERS

This **Code of Conduct** has been drawn up in order to outline the standards expected in commercial relations between AdB and its Suppliers and Commercial Partners, and to ensure that they adhere to these standards in order to prevent and mitigate the negative impacts of business activities on human rights and the environment and to enhance its positive impacts. Through the **Code of Conduct**, AdB in fact seeks to create a shared basis with respect to its expectations of Suppliers and Commercial Partners, ensuring that they adhere to the values and principles expressed in the **Code** in relation to the social, environmental and corporate governance issues for which they themselves are directly responsible.

In terms of this **Code of Conduct**, AdB's Suppliers and Commercial Partners are:

- (i) economic operators awarded works, services and supplies by the AdB Group companies, including consultants, professionals and external partners, including their sub-contractors and sub-suppliers;
- (ii) economic operators who are partners in various capacities and as per agreements and contracts with AdB, for any operational service purposes, while also including the chain of airport service activities in the broader sense, including their contractors, subcontractors and sub-suppliers.

Suppliers and Commercial Partners are required to operate in accordance with the principles contained in this Code and to disseminate such among their employees, suppliers, external partners and additional parties, within the supply chain.

UNDERLYING REGULATIONS AND PRINCIPLES

This Code of Conduct is based on major international principles and standards, including:

- *The Universal Declaration of Human Rights*
- *ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work and its subsequent editions*
- *ILO Tripartite Declaration of Principles on Multinational Enterprises and Social Policy*
- *ILO Standards on Labour and Occupational Health and Safety*
- *ILO Centenary Declaration for the Future of Work*
- *Rio Declaration on the Environment and Development*
- *The 2030 Agenda for Sustainable Development*
- *Ten Principles of the UN Global Compact*
- *UN Guiding Principles on Business and Human Rights*
- *OECD Guidelines for Multinational Enterprises*
- *WEPs Women's Empowerment Principles*
- *CRBPs Children's Rights and Business Principles*
- *UNCAC United Nations Convention Against Corruption*
- *International Covenants on Civil and Political and Economic, Social and Cultural Rights*
- *ISO 14001*
- *ISO 50001*
- *ISO 26000*
- *ISO 45001*
- *SA8000*
- *PdR 125*
- *UNI 30415*

AdB expects its Suppliers and Commercial Partners to comply with, in addition to those of the country in which they are located, all laws, rules and regulations applicable to its activities, including the local laws and regulations of all countries in which business is operated, production carried out or services provided.

HUMAN AND LABOUR RIGHTS

AdB requires all Suppliers and Commercial Partners to be committed to operating with full respect for human rights by guaranteeing, for all its workers, decent working conditions and ensuring fair employment practices. This applies to all workers, including temporary, migrant, student, contract, direct employees and any other category.

This in particular concerns:

- ensuring equal employment and pay opportunities without any discrimination based on race, colour, gender, language, religion, ethnic origin, disability, marital status, sexual orientation, political and trade union opinion, age, or any other condition that could give rise to discrimination
- ensuring a safe and healthy work environment for all employees that fully meets the standards required by current occupational health and safety regulations. Specifically, this concerns adopting ways of managing work processes by pursuing the continuous improvement of health and safety standards and reducing the risk of accidents and injuries
- complying with applicable regulations on the payment of social security and insurance contributions
- complying with the regulations on privacy and data processing of its working personnel
- ensuring a safe workplace in which there are no instances of harassment (physical, sexual, psychological or verbal), threats or any other form of abuse, and of not engaging in individual personality - limiting conduct at all stages of the employment relationship
- using fair and transparent labour recruitment practices in accordance with fundamental labour principles and rights and applicable international labour standards to protect the rights of workers, including migrant workers, from abuse and fraudulent practices during the recruitment and placement process, ensuring gender equality, and preventing human trafficking and forced labour
- not relying on foreign workers without residence permits or whose permits have expired - and for which renewal is not sought - or have been revoked or cancelled
- not employing or facilitating child labour, making sure that age verification procedures are in place and relying only on identity documents and education certificates issued by public agencies
- not forcing anyone to work against their will
- complying with all applicable domestic regulations and collective agreements on pay, working hours and paid vacations
- providing salaries and benefits in compliance with the minimum standards established by domestic, international and/or local laws and regulations in order to promote the material well-being of its employees as much as possible
- ensuring that the payment of wages and salaries complies with applicable laws and that payment is made in a traceable manner
- recognising workers' freedom of association, union rights, and the right to collective bargaining - thereby in a context free from the threat of retaliation or intimidation
- regulate relations with any subcontractors/sub-suppliers in writing, requiring them to comply with such requirements.

ENVIRONMENTAL PROTECTION AND ECO-SUSTAINABILITY

AdB expects Suppliers and Commercial Partners to operate in full compliance with all applicable environmental rules and regulations, responsibly assessing and managing their environmental impacts and pursuing the goal of reducing and mitigating those impacts within their processes and products, including by acquiring information and sharing the airport operator's sustainability strategy.

This means:

- managing its business and production processes, including in terms of negative impacts on the environment and evaluating solutions to mitigate or eliminate such impacts
- in defining and implementing its processes, assessing opportunities for reducing energy and natural resource consumption, including by favouring the use of energy from renewable sources
- where activities involve impacts on biodiversity, safeguarding the balance and functioning of the ecosystem by complying with applicable domestic and international laws
- assessing solutions to minimise environmentally harmful and greenhouse gas emissions
- dealing with any environmental emergencies, including by relying on management and intervention procedures designed to prevent, mitigate and control potential serious environmental and health damage
- where hazardous substances are used, taking all necessary precautions in order to reduce the risk of pollution from such substances
- optimising waste management and minimising waste and wastewater generation
- procuring materials, products and services with environmental sustainability criteria in mind.

INTEGRITY, ETHICS AND ANTI-CORRUPTION

AdB expects substantial compliance with the principles of Business Ethics as overall defined, adapted and updated from time to time by AdB. Suppliers and Commercial Partners commit to the full knowledge, respect and dissemination of the principles and requirements contained in the Code of Ethics, the 231 Organisation Model and AdB's Anti-Corruption Policy.

In particular, Suppliers and Commercial Partners commit to:

- fight against all forms of corruption, i.e. not to offer, give or receive improper payments or other benefits (cash or other benefits), regardless of value, nor encourage or allow others to do so, in order to obtain or retain business or any other advantage
- oppose the crimes of receiving stolen goods, money laundering, and self-money laundering and, therefore, comply with all the rules and regulations, both domestic and international, on anti-money laundering and terrorist financing
- ensure appropriate remuneration and payment terms for goods and services rendered or purchased
- operate with transparency and integrity by complying with all applicable domestic and international laws and regulations regarding the fight against corruption, bribery and fraud
- adopt conduct reasonably appropriate to prevent and combat corruption, bribery and fraud in all forms
- comply with all applicable laws and regulations on combating tax evasion, keep accounting, tax and financial records and statements in accordance with applicable laws and regulations, and take appropriate measures to ensure the traceability of each financial transaction
- compete in markets with fairness to competitors and customers, respecting the rules protecting fair and free competition
- avoid practices, agreements or understandings with competitors, suppliers, customers or other third parties aimed at illegal price fixing, exchange of sensitive information, market or customer sharing
- not to abuse its own possible dominant position in the market
- protect the digital information and personal data of AdB representatives and contact persons by implementing all necessary security measures, including in terms of information technology, and promptly share any breaches of information security, including those resulting from cyberattacks.

GOVERNANCE AND MANAGEMENT SYSTEMS FOR VIOLATIONS AND REPORTING

Consequences of violating the Code

In the event that the expectations of this Code are not met and AdB finds violations of the commitments made by Suppliers and Commercial Partners under this Code, the contractual relationship and, more generally, the relationship between the Parties may be re-evaluated and corrective actions may be pursued based on the terms of the relationship between AdB and the Suppliers or Business Partners. Such is up to and including the *pro tempore* or final exclusion from the Airport Operator's roster of Suppliers or Commercial Partners.

Relationship management and dialogue with AdB - Reporting and Whistleblowing

AdB encourages anyone who becomes aware of violations, critical issues and non-compliance of an Ethical nature and/or concerning any value, principle or conduct - active or passive, commissive, omissive or attempted - referred to in this Code, in addition to the relevant regulations, to make a REPORT, including anonymously and without fear of retaliation, through the Whistleblowing platform:

<https://bologna-airport.segnalazioni.net>

The dedicated IT platform for handling reports ensures the confidentiality of the reporting party and other parties involved, in addition to the content of the report and the related documentation. In this regard, please refer to AdB's Whistleblowing Policy available on the whistleblowing platform website and the AdB website.

VERIFICATION AND AUDIT SYSTEMS

AdB reserves the right to plan and conduct ESG Audits in order to assess the level of maturity and robustness of the defined controls and practices implemented by its Suppliers and Commercial Partners for:

- responsibly managing environmental, social and governance (ESG) performances
- ensuring compliance with the applicable regulations and standards
- mitigating risks
- promoting continuous improvement
- supporting the adoption of best practices
- collaboratively supporting any remedial actions.



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