

## Code of Conduct for Business Partners of the Stern Energy Group

This Code of Conduct for Business Partners ("BPCC") has been adopted by Stern Energy S.p.A. in its capacity as the parent company of the Stern Energy Group and applies to all companies belonging to the Stern Energy Group, including its subsidiaries and affiliates. Unless otherwise specified, any reference to "Stern Energy" in this BPCC shall be deemed to refer to Stern Energy S.p.A. and/or any company within the Stern Energy Group that is involved in the business relationship with the Business Partner.

Economic success and social responsibility are inseparably linked. Responsible and ethical behaviour towards employees, business partners and society is an integral part of Stern Energy's value system. In addition, sustainability and responsible action are firmly anchored in our corporate culture. We attach just as much importance to compliance with essential standards focusing on the environment, social matters and corporate integrity as to the economic success and further development of our Group.

Given this background and as part of the Encavis Group, Stern Energy Group and each of its Country subsidiaries regards the recognition of general international accepted agreements and standards as the basis for business relationships, and therefore respects human rights, labour standards, environmental protection as well as business ethics.

Accordingly, Stern Energy expects its business partners to acknowledge the United Nations Guiding Principles on Business and Human Rights and to comply with fundamental conventions of the International Labour Organisation (ILO). All business partners shall acknowledge the fundamental laws, regulations and policies relevant to their respective activities carried out jointly with or on behalf of Stern Energy.

The rules of conduct set out in this Code of Conduct (hereinafter referred to as the "Business Partner Code of Conduct" or "BPCC") derive from this commitment.

### I. Environment and climate

#### > Environmental regulations

Our business partners shall comply with applicable environmental, health and safety laws.

#### > Environmental impact

Our business partners shall conduct their business responsibly with regards to environmental risks and impacts. Stern Energy expects business partners to use their

management systems to develop and apply processes and procedures to minimize environmental impacts and risks and to continuously improve their environmental performance. They shall use resources efficiently, employ energy-efficient and environmentally friendly technologies and reduce waste and emissions to air, water and soil.

> **Greenhouse gas emissions and energy**

Our business partners shall continuously work to minimize greenhouse gas emissions in line with the Paris Agreement (limitation of global warming to 1.5 degrees by achieving a climate-neutral world by 2050), use renewable energy and improve energy efficiency.

## II. Society

> **Human rights**

Our business partners shall respect the protection of internationally proclaimed human rights and fight against forced labour (including modern slavery and human trafficking) and child labour.

> **Labour standards**

Our business partners shall treat their employees with respect and create a workplace that is free from harassment or abuse of any kind, without harsh and inhumane treatment and free from unlawful practices or discrimination. Business partners shall create an inclusive work environment that respects the diversity of their employees and the local community. They shall enable their employees or other stakeholders to report concerns or potentially unlawful practices in the workplace (including access to whistleblowing channels or reporting mechanisms).

> **Freedom of association and collective bargaining**

Our business partners shall respect the rights of employees to freedom of association and collective bargaining in accordance with applicable legislation.

> **Working hours and remuneration**

Our business partners shall comply with applicable laws and collective bargaining agreements governing minimum wages, working hours and employment conditions in the Country in which they operate.

> **Respect for diversity**

Our business partners shall act responsibly in their dealings with local communities. This also applies to indigenous peoples and landowners, whose rights, livelihoods, resources, and cultural heritage must be respected and treated with esteem and fairness.

### III. Business ethics

#### > Anti-corruption

Our business partners shall prevent corruption in any form.

#### > Fair competition

Our business partners shall comply with competition and antitrust laws.

#### > Conflicts of interest

Our business partners shall take adequate precautions to prevent relationships, activities, or transactions where private interests or relationships have influenced or may potentially influence a business decision.

#### > Money laundering prevention

Our business partners shall comply with applicable laws on the prevention of money laundering.

#### > Protection of confidential information

Our business partners shall protect confidential and other proprietary information and trade secrets they receive from us in the course of the business relationship.

#### > Data protection and IT security

Our business partners shall comply with applicable data protection and information security requirements in their handling of information.

#### > Inside Information and Insider Trading

Our business partners shall comply with insider trading laws. Where our business partners become aware of inside information relating to Stern Energy or any other company, they shall handle such information in accordance with applicable insider trading and market abuse regulations.

### Sense of responsibility

We expect our business partners to know their business areas or markets, where stricter rules than those described in this BPCC may apply. In such cases, our business partners shall guarantee that such rules are applied. Our business partners ensure that their own subcontractors, suppliers and business partners engaged in activities for or on behalf of Stern Energy are also aware of and comply with the minimum requirements of this BPCC (*supply chain compliance*).

## Dealing with suspicions

In the event of violations of this BPCC, Stern Energy reserves the right to respond appropriately depending on the severity of the violation. This includes, but is not limited to, the demand to remedy the violation without delay, the assertion of claims for damages or the termination of the contract. In the event of serious violations of this BPCC, Stern Energy reserves the right to immediately terminate the contract upon simple notice.

## Implementation and control

Our business partners shall implement appropriate processes to ensure compliance with this BPCC. Upon Stern Energy's request, the business partner shall provide the necessary information.

In case of reasonable doubt, Stern Energy is entitled to verify compliance with the applicable principles by means of an audit based on the OECD Due Diligence Guidance. If, in the opinion of Stern Energy, the principles are not complied with, the business partner shall, together with Stern Energy, take necessary steps to ensure implementation.

## Contact

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