

PREMISE

BCUBE, aware of its role as a market leader and innovator at a global level, has chosen to promote the culture of Sustainability.

This Sustainable Procurement Policy (also "Policy") promote sustainable and responsible procurement practices along the entire supply chain.

BCUBE, which has always been committed to adopting the principles and standards detailed in this document, also requires its Suppliers / Subcontractors to recognize and adopt them and to ensure compliance with them.

Compliance with and signing this Policy is a necessary condition for establishing and maintaining a business relationship with **BCUBE**. The violation of this Policy will entitle **BCUBE** to finish the business relationship.

APPLICATION PERIMETER

This Policy is adopted by the Company and its associates or investee companies directly and indirectly, which are part of **BCUBE** Group.

There is the possibility for the Company to identify, based risk and limits regulations of our specific sector, to which other Companies to extend the Policy.

REFERENCE DOCUMENTS

This Policy should be read in conjunction with the following documents that prescribe the principles and values and from which **BCUBE** is inspired:

- Code of Ethics.
- Organization, Management and Control Model Legislative Decree 231/2001.
- Health, Safety and Environment Policy

Suppliers/ Subcontractors are required to comply with the rules and standards in force in the countries in which they operate, so that local regulations are less stringent than the principles contained in this Policy, undertake to adopt, within a reasonable period, the necessary measures to comply with the principles and behaviors defined in this Policy and detailed below.

This Policy applies to all Suppliers in all countries in which **BCUBE** operates.

COMMITMENT

BCUBE has among its primary values that of Business, Social ethics, and Sustainable Development (through tools such as the Supplier Code of Conduct – Sustainable Purchasing Policy, the Code of Ethics), through which it is sending a message of loyalty, fairness, and respect and which represents a point of reference in the social reality in which it operates.

BCUBE considers of particular importance the creation of transparent and lasting relationships with the actors of its supply chain and the sharing of the values and principles to which Bcube is inspired in the performance of its activities.

To this end, **BCUBE** has decided to adopt a Suppliers' Code of Conduct - Sustainable Purchasing Policy, which defines the principles and rules of conduct that it requires to be respected along its supply chain.

This Policy is inspired by the principles set out in the Ilo (International Labour Organization) Fundamental Conventions and the United Nations Universal Declaration of Human Rights.

The Top Management:

- establish the commitments undertaken in this Policy risk – based
- identifies the KPI
- receives the KPI monitoring
- adopts actions to support the implementation and when there will be a violation

Our mission is therefore to operate in a framework of fair competition, with honesty, integrity, fairness, and good faith, respecting the legitimate interests of the shareholder, employees, customers, partners, the local community with which we enter a relationship.

BCUBE promotes Corporate Social Responsibility, and a sustainable supply chain, integrating attention to social, environmental, and governance issues within its strategic vision.

We believe that close collaboration with our supply chain is essential to achieve high levels of quality in our achievements, services, and production activities.

The establishment of collaborations, the Supplier Code of Conduct – Sustainable Purchasing Policy, the Code of Ethics are the ways in which **BCUBE** involves and interacts with its supplier base. Suppliers/subcontractors are strategic allies who support us in the realization of the works covered by the purchased orders able to offer Customers / Clients the best in terms of quality, environment, sustainability, ethics, social responsibility, innovation, and performance.

Bcube imposes supply chain management methods that guarantee the integration of sustainability, ethical and social criteria in the selection and involvement of Suppliers/Subcontractors.

Bcube has defined a structured process for the management of its suppliers to whom it requires to share and implement the principles expressed in the Sustainable Purchasing Policy, whose respect will be an increasingly important component in the evaluation and selection phase of Suppliers / Subcontractors.

The selection of Suppliers/Subcontractors and the determination of purchasing conditions are based on an objective assessment of price quality and the ability to provide and guarantee services of an appropriate level and to propose innovative solutions.

CUSTOMER CENTRICITY

Professionalism, competence, availability, and ethics of behavior are the guiding principles that **BCUBE** implements in relations with customers, with a view to collaboration and continuous support, to guarantee satisfaction and trust of its business partners.

BCUBE is committed to creating value for customers, understanding their needs and expectations, responding to their needs through concrete solutions and quality advice.

Customer satisfaction and centrality is fundamental for **BCUBE**, which is committed to establishing lasting relationships and valuable collaborations for both, combining experience with the ability to anticipate market trends and change.

BCUBE adopts a responsible approach to the management of the flow of data and information, which are constantly and continuously received from customers.

Customer privacy is ensured by the adoption of high standards of data protection and security.

Transparency and objectivity are the key principles of **BCUBE**'s commercial and communication policies, which provide for the dissemination of information through special tools and ad hoc channels.

THE PARTNERSHIP

BCUBE believes that the selection of Suppliers / subcontractors innovative and reliable partners, willing to build with us a common success starting from a high degree of creation of added value, commitment, flexibility is the fundamental requirement for a lasting relationship.

The goal is to establish a long-term partnership relationship, characterised by transparency and collaboration.

Development, growth, and efficiency begin precisely in the selection phase of the Supplier with which to start the collaboration that takes place according to a documented procedure that guarantees impartiality and equal opportunities to all those involved.

Using specific purchasing methods calibrated on the different product categories Bcube strives to obtain the best conditions in terms of performance, price, quality, ethics, and sustainability throughout the entire life cycle of the product/service.

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Suppliers/Subcontractors are invited to implement the necessary mechanisms to identify, determine and manage the resources in all areas covered by this document and to comply with all applicable legislative requirements, as well as to continuously improve the suitability, adequacy, and effectiveness of their Sustainability Policies through appropriate measures.

They are also invited to maintain appropriate documented information demonstrating the sharing and implementation of the values expressed in this document. Subject to agreement with the Supplier, **BCUBE** reserves the right to carry out audits relating to the implementation of the principles set out in the Supplier Code of Conduct, the Sustainable Purchasing Policy, and the Code of Ethics.

In addition, the Supplier/Subcontractor, as a specialist in activities/services, is increasingly involved in the initial phase of the Management of Orders, to share technical and economic commitments with the Company.

THE ECONOMIC REPORT

BCUBE aims to avoid situations of mutual dependence; therefore, on the one hand it takes care not to build conditions of monopoly of supply within the same segment of product / service, on the other hand, it tries to limit as much as possible the degree of dependence of suppliers / Subcontractors on purchase orders that come to them from **BCUBE**.

THE RULES OF THE RELATIONSHIP

General reference conditions have been implemented differentiated according to the different types of supply ("General Conditions of Purchase of Products" and "General Conditions of Contract / Subcontracting"), which together with the contractual models that derive from them, form the basis for supply relationships with **BCUBE**. In addition, Suppliers / Subcontractors who access our construction sites are required to provide extensive and stringent documentation regarding Contributions, Remuneration, Regulations, Environmental, Occupational Health and Safety, Social Responsibility, Energy Management, Sustainable Development and Anti-Corruption aspects.

BCUBE's Suppliers/Subcontractors are also required to:

- adopt behaviors that comply with the principles of ethics and transparency of the business and are called to avoid any situation of conflict of interest that may affect the business relationship with **BCUBE** or that may interfere with the ability to carry out their activities impartially and for the benefit of the Company, or other third parties.
- not to request, be promised or accept gifts, invitations, or other preferential treatment for themselves or third parties and must also comply with the laws on anti-money laundering, self-laundering and receiving money, goods or other benefits.
- comply with applicable antitrust laws and regulations and to pursue the principles of fair and transparent competition.
- refrain from conducting its activities, from engaging in any restrictive practice or capable of unlawfully disturbing the market.

LABOUR AND HUMAN RIGHTS

In line with international standards and with a view to protection and social sustainability, to prevent and/or prevent its business from causing or contributing to human rights violations, **BCUBE** also requires its Suppliers to:

- Do not resort to child labor. They must not, under any circumstances, hire staff, under the age of 15, unless it is a professional traineeship, training or apprenticeship program authorized by the Government and of manifest utility for the participating person.
- Do not use any form of forced labour. They must not tolerate the use of any disciplinary practice involving the use of physical and psychological violence and must oppose any form of human trafficking and modern slavery.

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- Recognize, respect, and fully guarantee the right to work and free association of its employees in all establishments and apply the forms of collective bargaining in cases where rules and / or social system provide for them. Suppliers must work constructively with their employees, or any organization representing them, to promote their best interests. Suppliers must try to create opportunities to listen to their employees.
- Do not tolerate any form of harassment and/or discrimination based on gender, minority affiliation, political opinions and religious beliefs, age, ethnicity, marital status, family status, disability, and any other personal condition, and must recognize and promote the positive value of diversity.
- Comply with the applicable rules on the regulation of working time.
- Promote the material well-being of its employees as much as possible. Remuneration and allowances must be paid in accordance with the regulations in force.
- Confirm the planning, if not present, about incentive remuneration policy
- Adjust salary levels and hours worked, in a sustainability view.

ETHICS

BCUBE requires Suppliers to act with transparency and integrity.

Fair competition is a fundamental prerequisite in creating business success, for achieving positive financial performance and creating value for shareholders. Suppliers must act in accordance with the competition, antitrust, and trade rules applicable in each country in which they operate.

Any form of agreement in violation of competition is strictly prohibited, as well as commercial practices in violation of antitrust rules.

Suppliers must report any material conflict of interest, actual or potential, in the performance of their activities. There is a conflict of interest when a personal interest or activity interferes or could interfere with the business relationship with **BCUBE**.

Suppliers must confirm the existence of a whistleblowing policy, with the aim of implementing an organizational culture based on integrity and ethics.

An effective whistleblowing process builds trust if it educates employees and other third parties to company standards; provides clear guidance on the reporting process; explains how to report an irregularity; defines the types of reports that can be sent; outline any legal protections or restrictions. In order to promote ethical behavior and encourage a corporate culture in which irregularities are reported securely and internally, in order to avoid reputational damage and financial loss. Any retaliation against the whistleblowers is prohibited.

QUALITY

BCUBE promotes the continuous improvement of the performance of its Suppliers and their involvement in product innovation processes, with a view to strategic partnerships.

To guarantee maximum safety and quality of products, **BCUBE** is committed to involving Suppliers from the early stages of the development of a project, adopting a preventive and proactive approach, which allows to anticipate and solve any critical issues.

To pursue its Quality Policy, Bcube requires Suppliers to have a certified Quality Management System. **BCUBE**'s goal is that all suppliers of direct materials, services and/or services related to the product are at least certified according to the international standard ISO 9001.

HEALTH AND SAFETY AT WORK

BCUBE, makes the protection of health and safety at work a key principle of its action and its way of doing business. Therefore, it asks the Supplier to define and maintain Occupational Health and Safety Policies aimed at providing safe and healthy working conditions to its employees in compliance with the applicable legal requirements. Especially:

- Suppliers are required to adopt the principles of Management Systems which, inspired by the ISO 45001 standard (or equivalent), promote the continuous improvement of performance.

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- Suppliers are committed to spreading and consolidating a culture of safety that promotes responsible behavior on the part of workers.
- If an outsourced production process has been assigned to the Supplier, the latter undertakes to adopt the applicable legislation and to eliminate, where possible, the dangers to the health and safety of workers, as well as to assess the residual risks, implementing solutions aimed at reducing them up to a minimum level.
- Those Suppliers who carry out their activities at BCUBE locations are required to adopt **BCUBE's** Health and Safety Standards.

ENVIRONMENTAL PROTECTION

BCUBE fully adheres to the principles of sustainable development by committing itself to minimizing the expenditure of non-renewable resources and keeping the consumption of renewable resources within the limits of their reconstitution. To pursue this objective, the contribution of the entire supply chain is a fundamental and indispensable element.

One of **BCUBE's** priorities is to reduce CO2 emissions throughout the entire product life cycle. To reduce the impact of the Supply Chain on the carbon footprint, Bcube asks its Suppliers for availability and transparency regarding the communication of emissions deriving from business processes and upstream activities and the commitment to implement effective measures to reduce direct and indirect CO2 emissions.

In addition, to minimize the impact on the environment of their production activities, Suppliers must:

- Develop and maintain an Environmental Management System compliant with ISO 14001 standards, preferably obtaining certification from a third party.
- Commit to optimize the use of natural resources, to reduce emissions harmful to the environment, those responsible for the "greenhouse effect".
- Design products and processes that minimize the impacts on the environment in their life cycle, regard to water resources - so that consumption must be progressively reduced, and any form of contamination avoided - and the use of energy, the production of which is responsible for climate-altering emissions.
- progressively reduce the use of energy from fossil sources by encouraging on-site self-generation projects and energy supply from renewable sources.
- suggest to Bcube the adoption of alternative products and processes that improve the environmental impact in their life cycle, such as, for example, materials of secondary origin with a view to circular economy.
- appropriately manage, in accordance with current rules, the treatment and disposal of waste, reducing as much as possible the production of waste destined for disposal in landfills in favor of recoverable waste.
- avoid the use of dangerous substances where technically possible, and where their substitution is not feasible, manage them in accordance with the applicable rules, not only in relation to the place of production, but also to the place of destination of the products.
- Supplier must submit documentation for responsible management of chemicals.
- Adopt optimized logistics procedures and encourage the use of means of transport that minimize the impacts on the environment.
- Stimulate its supply chain in minimizing environmental impacts in line with the commitment that **BCUBE** has assumed as its own and that it asks of its suppliers
- Prefer recyclable packaging and FSC certified paper, guaranteeing the origin of the product from a forest and a responsibly managed supply chain.
- Prefer the purchase of steel materials from suppliers who produce by implementing measures for the health and safety of workers, energy efficiency and the reduction of environmental pollution.

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- Reduce the impact of distribution, favoring the procurement of materials, products, services from local companies,
- Promoting the reuse and recycling of materials and products at the end of their life cycle and, where it is not possible, ensuring disposal in the most correct way.
- Commit to favoring the use of renewable sources, minimizing the environmental impact of its activities, protecting local ecosystems and biodiversity, promoting the conscious and responsible use of all available natural resources, adopting systems to ensure the manipulation, conservation, recycling, reuse or management of waste and the management of emissions into the atmosphere and waste water take place in a safe way and in compliance with current legislation, also supported by the adoption of Certified Management Systems according to recognized Standards.
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USE OF CRITICAL MATERIALS FOR ENVIRONMENTAL AND SOCIAL IMPACT

BCUBE is committed to purchasing raw materials and components from Suppliers and business partners who can demonstrate respect for human rights in conducting activities along its supply chain.

BCUBE also reserves the right to request from Suppliers the presence and origin of other materials critical for environmental and social impact, in accordance with the evolution of the relevant legislation and in fulfillment of Customer requests.

INFORMATION SECURITY

BCUBE considers information security an indispensable factor for the protection of its assets and that of interested parties, as well as a factor of strategic value that can be translated into a competitive advantage.

BCUBE operates in compliance and is constantly committed to increasing its level of maturity through the implementation of measures, both technical and organizational, necessary to best guarantee the integrity, confidentiality and availability, control, authenticity and privacy of its information assets and that of its Customers, Partners, Suppliers, and Employees.

Therefore, to ensure that Information is protected along the entire Supply Chain, **BCUBE** requires its suppliers to

- Treat the information provided by **BCUBE** appropriately and implement administrative, physical, and technical controls that are no less stringent than industry standards
- Also include the following controls:
 - Securing company facilities, paper archives and computer equipment.
 - The protection of the transmission, storage and disposal of information.
 - The implementation of access and authentication controls.
 - The segregation of Bube's confidential information from that of other Customers and Suppliers
 - The provision of appropriate training on information security to its employees.
 - The control of the copy and printouts of **BCUBE** information.
- Implement and maintain additional Security controls, as agreed between **BCUBE** and the Supplier.
- Notify **BCUBE**, as soon as possible, of any breach of Information Security and make every effort to resolve it immediately and prevent future security breaches.

Suppliers / Subcontractors are also required, in compliance with applicable laws and regulations, not to refer to third parties and in any way for reasons that are not strictly related to the execution of the contract, the technical information and all confidential and strategic information made available by **BCUBE**.

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The obligation of confidentiality continues even if there is termination of the employment / collaboration relationship. The information of which the Recipients become aware during the work activity must be managed with due confidentiality; they may not be used for illicit purposes, either for personal interest or to bring benefits to society.

FORMATION

BCUBE undertakes to train on the principles referred to in this document and encourages all Suppliers to disseminate these principles through adequate training of their employees and Suppliers.

The development and use of advanced communication tools make it possible, on the one hand, to speed up the exchange of information, and on the other to guarantee the transparency of relationships.

MONITORING AND CORRECTIVE ACTIONS

BCUBE requests information from its Suppliers relating to the issues mentioned above through specific questionnaires/surveys and reserves the right to carry out checks through audits conducted by **BCUBE** or by third parties expressly authorized by the latter

In case of non-compliance:

- It will require Suppliers to prepare, and subsequently implement, a Non-Compliance Recovery Plan.
- It will conduct documentary checks and/or through further audits to ascertain the effective implementation of the recovery plans referred to above, subject to appropriate prior communication.

In the event that the Supplier violates the principles of this Policy, does not actively contribute to providing the requested information, or, in the event that Non-Conformities are found and the appropriate improvement plans are not prepared and implemented, **BCUBE** reserves the right to suspend precautionarily and / or to terminate any commercial relationship in advance with immediate effect, as well as to act for compensation for any loss, damage, expense or other costs directly or indirectly that may arise from any failure and / or conduct by the Supplier .

The central themes of our sustainable sourcing policy are set out below.

Focus on needs: We carefully examine our supply/procurement/procurement needs, buying only what is needed and looking for more sustainable alternatives.

Integration: sustainability of procurement is integrated into all procurement practices to maximize sustainable results.

Analysis of all costs: we consider the costs incurred during the life cycle, the value for money obtained and the costs and benefits to society, the environment and the economy deriving from procurement activities.

Continuous improvement: We work to continuously improve sustainability practices and outcomes and encourage our suppliers to do the same

The achievement of the objectives set, through the Policy, will also be possible through the scrupulous and timely application of what is reported in the Manual of the Sustainable Procurement Management System, which defines and describes the management system implemented by our company.

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Each company acquirer is the protagonist in achieving sustainable sourcing, at all stages of the purchase process of goods and services, through the effective and efficient application of the Sustainable Procurement Management System and the continuous improvement of ways of operating, knowledge and experience.

This Policy to be a framework for the management of its Sustainable Procurement Management System and for the annual definition and review of its specific objectives, is for all **BCUBE** supplier and made available to the remaining interested parties.

Casale M.to, 23 January 2023

BCUBE S.p.A.
Chief Executive Officer
Luigi Bonzano

