

Suppliers' Code of Conduct

2024



webuild 

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A grayscale background image showing a hand wearing a work glove holding a steel rebar. A wire mesh is attached to the rebar, and another rebar is visible in the background. The image is slightly faded and serves as a backdrop for the table of contents.

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INTRODUCTION

For over 110 years, Webuild has worked across the world, implementing infrastructural projects in strategic sectors such as water, energy and sustainable mobility, contributing to the development of the territories and improving the life of the communities in which it operates.

We work in 50 countries, employing approximately 35,000 direct workers, in addition to tens of thousands of people in the supply chain engaged in our projects.

Our strict application of the highest standards of integrity, fairness, reliability and sustainability are at the basis of our capacity to create shared value and to establish solid relationships of trust with our stakeholders. We have built our reputation on the constant application of those principles in our daily activities.

This is why we ask our suppliers to share these principles with us, working side by side to offer to our customers and all our stakeholders the best solutions and performances from the pre-procurement stages and throughout the entire implementation cycle of our projects.

The principles indicated in this document illustrate the commitment of our company and the commitment we expect from you, our suppliers, from the very start of our collaboration, together with the principles of conduct that must be respected when we work together.

It is essential for your personnel and those of your own suppliers to be informed of the contents of this document and to ensure that this document is respected and disseminated.

PRINCIPLES OF CONDUCT FOR WEBUILD SUPPLIERS

Quality and performance excellence

THE COMMITMENT OF WEBUILD

We promote the use of the best skills, techniques and technologies available for the planning and implementation of our projects. We involve the entire value chain in order to guarantee that our works are implemented professionally and in full respect of design requirements, to meet and exceed the expectations of our customers.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- operate in full respect of Webuild's Quality policies and the applicable contractual requirements, checking and constantly overseeing their respect by your personnel and by your own suppliers;
- adopt and implement a Quality management system compliant with international standard ISO 9001:2015 (or similar);
- reduce to a minimum any non-conformities and the consequent potential complaints deriving from your direct activities and those of your own suppliers;
- promote initiatives that contribute to the continuous improvement of the production processes and quality performances.

Occupational health and safety

THE COMMITMENT OF WEBUILD

We protect the integrity, health and safety of our workers in all our activities and in all workplaces.

We consider the protection of our people to be a non-negotiable priority; this is why our goal is to achieve zero accidents in our activities.

Anyone, in our workplaces, has the right to intervene and suspend the activities if there is any doubt that health and safety may be compromised.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- operate in full respect of Webuild's Health and Safety policies and the applicable contractual requirements, checking and constantly overseeing their respect both by your own personnel and by those of your own suppliers and subcontractors;
- adopt and implement an Occupational Health and Safety management system compliant with international standard ISO 45001:2015 (or similar);
- reduce to a minimum workplace accidents and incidents, also through appropriate awareness-raising, information, training and education programmes for workers, encouraging the adoption of responsible and safe behaviours.

Environment

THE COMMITMENT OF WEBUILD

We protect the environment in all our activities, operating in full respect of the applicable laws and orienting our actions towards principles of prevention, precaution, eco-innovation, and the *green* and *circular economy*.

We promote the rational use of natural resources and energy, as well as the minimisation of environmental impacts in terms of waste, emissions, biodiversity, and cultural and landscape heritage.

We also guarantee the right for everyone to intervene if there is any doubt that the environment may be compromised.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- respect the local environment, favouring the responsible use of resources and the use of recycled and recovered products and/or those less harmful to the environment, preferring local products, in support of the regional economy and more generally the principles of the green economy and the fight against climate change;
- reduce to a minimum the impacts on natural ecosystems and inconveniences for local communities resulting from your actions, limiting, where possible, the production of waste, emissions and effluents, as well as promoting the recovery and reuse of waste products;
- operate in conformity with the applicable laws and the requirements of Webuild's Environmental Management System, actively participating in training, communication and development activities for improving environmental performances.

Fair and favourable working conditions

THE COMMITMENT OF WEBUILD

We protect the integrity and dignity of all persons who collaborate with us, guaranteeing working conditions respectful of the human rights ratified in the International Bill of Human Rights of the United Nations and in the Fundamental Conventions of the International Labour Organisation.

We protect workers from acts of harassment and violence, both physical and mental. We do not tolerate any form of illegal, child, forced or bonded labour, or practices that constitute modern forms of slavery and human trafficking.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- guarantee staff working conditions that comply with the applicable local regulations, the collective agreements and the ILO conventions of reference in relation to working hours, overtime, holidays, wages, benefits and accommodation conditions, where provided. Wages must be paid directly to workers, regularly, without delay and without deductions not required by law;
- employ only workers aged above the minimum established by local regulations or the minimum school leaving age and, in any case, not aged under 15. Workers whose age is under 18 must be assigned activities compatible with the protection and development of their physical and mental health;
- reject any form of forced, bonded and illegal labour, including modern forms of slavery and human trafficking. Workers must not in any case be asked to pay recruitment or employment fees, or asked to deposit money or identity documents. They must not be subjected to restrictions of their freedom of movement and resignation;
- grant to workers the freedom of association and the right of collective bargaining and, if those rights are limited or prohibited by the applicable local regulations, facilitate the adoption of alternative legal systems of dialogue with workers.

Equal opportunities and non-discrimination

THE COMMITMENT OF WEBUILD

We offer to our personnel equal employment opportunities in all phases of the working relationship, guaranteeing that every decision is based upon objective criteria.

We combat any violent, threatening or intimidating behaviour, coercion, sexual harassment, bullying and mobbing. Similarly, we do not tolerate any form of discrimination based upon gender, nationality, ethnic origin, race, social and civil status, religion or any other characteristic protected by law or unrelated to working requirements. On the other hand, we promote the creation of inclusive workplaces in which diversities are recognised, promoted and valued.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- guarantee equal opportunities of treatment to workers in processes that regulate all phases of the employment relationship (recruitment, training, promotions, reorganisations, etc.);
- combat offensive, discriminatory, violent and intimidating behaviours in the workplaces, ensuring that any causes that may give rise to discrimination, even involuntarily, are removed;
- promote in the workplaces a culture that values diversity and inclusion, also by staff training and awareness-raising actions.

Local communities

THE COMMITMENT OF WEBUILD

We respect the rights and the cultures of communities affected by our activities, maintaining open dialogue with them. We are constantly committed to mitigating any inconveniences that our activities cause to local communities.

We adopt a business model aimed at contributing to the development of the areas in which we operate, by creating job opportunities for the local communities, through professional training, and by using local suppliers and promoting social initiatives.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- respect local cultures and traditions, as well as the regulations applicable in the countries in which you operate;
- reduce to a minimum inconveniences caused to the local communities, collaborating in the development of shared solutions and guaranteeing the prompt implementation of the planned mitigation actions;
- support, insofar as possible, the local economy, using local personnel and suppliers, so as to contribute with us to the economic and social development of the areas in which we operate.

Anti-Bribery and combating fraud

THE COMMITMENT OF WEBUILD

We recognise the importance of running our business in compliance with laws, with integrity, transparency and fairness in all countries in which we operate.

We combat any form of fraud and bribery, active or passive, which may involve not only Public Officials but also private entities, and we undertake to operate according to the highest ethical standards.

We have implemented a complete programme to prevent risks of unlawful practices in running our company activities, laying down rules and principles based upon the strictest provisions on anti-bribery and combating fraud.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- operate in full compliance with laws and ethical principles;
- operate in full respect of our Anti-Corruption Model;

- apply, in choosing your own suppliers, the same criteria of impartiality and fairness that inspire Webuild;
- not offer, give or receive payments or other improper benefits, or encourage or allow others to do so, to obtain or maintain an advantage, even if these practices are considered normal in a given context;
- not offer, to Webuild's staff and, in general, to anyone who carries out activity on our behalf, gifts or other benefits aimed at obtaining favourable treatment, of any nature, even only potential;
- report any episode of bribery, even only attempted or suspected;
- report any other fraudulent conduct of any nature, undertaken by any person (internal or external to the company).

Correct management of financial flows

THE COMMITMENT OF WEBUILD

We guarantee that our financial and non-financial reporting is transparent, complete and comprehensible, as this is an essential element for Webuild's credibility and reputation. We respect all rules and provisions, both national and international, on money laundering and terrorist funding. We hold business relationships exclusively with counterparties of high standing which satisfy certain requirements in terms of integrity and professional reliability.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- provide, during our business relationships, correct, truthful and complete accounting information;
- not request the use of cash or other untraceable payment methods (e.g. virtual currencies);

- not hold relationships with natural or legal persons included in the Lists of Reference published by the Authorities combating organised crime, terrorism and money laundering.

Unfair competition

THE COMMITMENT OF WEBUILD

We believe in fair and sustainable competition, seen as a means for selecting the best suppliers for Webuild and for improving quality in the procurement phase of goods and services.

We guarantee respect of competition laws in the markets in which we operate, and we work with market Regulatory Authorities, refraining from collusion and behaviours abusing a dominant position.

We prohibit the collection of information on competitors through unlawful means or those contrary to ethics.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- not use, for the purposes of winning a supply, unfair tactics, such as the abuse of your position within the market or the creation of cartels in order to exclude other companies from the tenders, also by way of price fixing practices;
- not share with us information on our competitors or your offers to them, and not use with them, in order to obtain improper advantages, information obtained during our business relationships;
- report any anti-competitive behaviour, even only suspected.

Conflict of interests

THE COMMITMENT OF WEBUILD

We guarantee that every decision connected to the business activities is taken in Webuild's exclusive interest, avoiding any conflict of interest situation, even only potential, in order to maintain the highest level of integrity in running the business. We adopt company procedures that guarantee correctness and transparency in the conduct of the activities by our directors, managers, employees and collaborators, avoiding any situation that may affect their independence of judgment and choice, or that may be in contrast with their responsibilities and duties held within the structure or on behalf of Webuild.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- avoid any situation that may lead to conflicts of interest or that may interfere with the capacity to make impartial decisions. These are occasions on which the behaviours or decisions of your directors, managers, employees or collaborators may generate an advantage, immediate or deferred, for themselves or their relatives/acquaintances, to the detriment of the business interest;
- report any conflict of interest situation, even potential, of which you become aware, from as early as the negotiation phase with Webuild.

Privacy

THE COMMITMENT OF WEBUILD

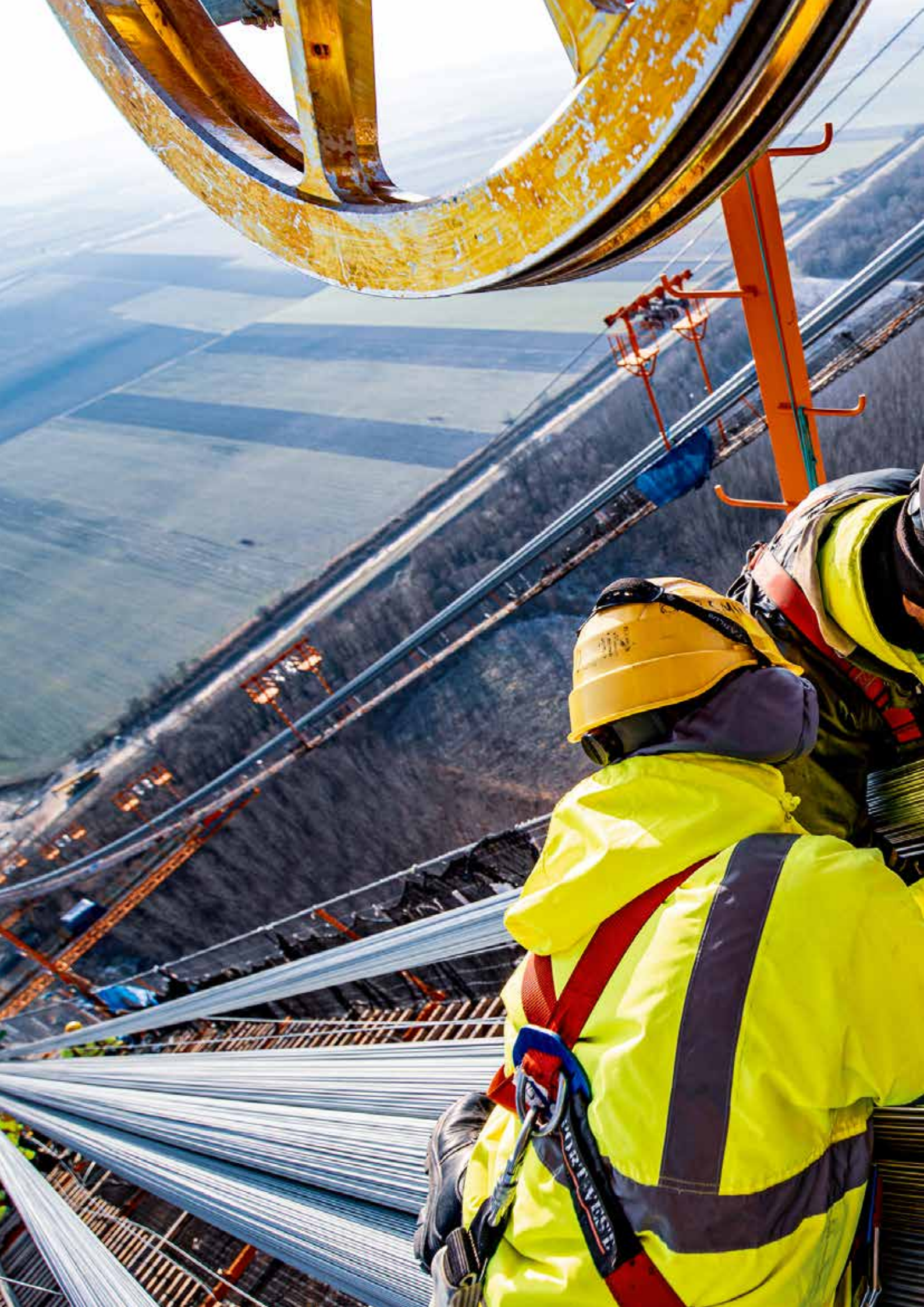
We guarantee that the processing of the personal data of our employees and the persons who enter into contact with us occurs in respect of the fundamental rights and

freedoms, as well as the dignity of the data subjects, as required by the regulations in force in the countries in which we operate. We process personal data lawfully and according to fairness and we register the data collected only for certain, explicit and legitimate purposes, storing it for the period of time not exceeding what is necessary for the purposes of the collection. We adopt suitable security measures during the collection and storage of personal data, in order to avoid risks of destruction or loss of the same, unauthorised accesses or processing that is not permitted.

THE COMMITMENT OF SUPPLIERS

As a Webuild supplier, you undertake to:

- process the personal data according to methods that we have agreed together;
- collect only data necessary for specific purposes and strictly linked to the conduct of your activity;
- adopt suitable measures to ensure that the data are stored carefully and for a period appropriate to the expressed requirement, guaranteeing that the same are kept updated;
- protect access to the data by unauthorised entities, guaranteeing their integrity and confidentiality through the most suitable technical and organisational tools.





APPLICATION

Recipients

This document is binding for all Webuild suppliers and, together with the Code of Ethics, it constitutes an integral part of the contractual relationships with the Company. In particular, in carrying out the contractual relationships with Webuild, you must guarantee that:

- your staff;
 - your own suppliers and their staff,
- are adequately informed of the contents of this document and operate in respect of its principles of conduct.

Respect of the law

As a Webuild supplier, you must strictly respect the applicable laws and the principles contained in this document, even when the latter establishes more stringent standards than - but not in contrast with - the applicable regulations. If you are in any doubt, please contact your Company representative to request clarifications.

Monitoring

Webuild regularly monitors its activities and performances, by way of reporting systems, inspections, audits, periodic performance assessments, etc., also involving the activities carried out by its suppliers. As a Company supplier, you must collaborate fairly and transparently in the conduct of those activities. Similarly, you must assess your suppliers and guarantee that they respect the contents of this document. Any circumstances of lack of respect of the principles and requirements contained in this document must be promptly resolved, at no additional cost to the Company. As provided by the Compliance Clause included in the contract agreements with the Company, Webuild reserves the right to terminate the contractual relationship and/ or to interrupt the commercial relationships.

Reports

Constant and constructive dialogue forms the basis of the relationships between Webuild and its suppliers. Any violations of the contents of this document, suspected or ascertained, must be appropriately communicated to the relevant Function by way of:

- the IT platform
<https://webuild.integrityline.io/>, or
- email to the address
compliance@webuildgroup.com

The Company manages reports received based upon the provisions of the company procedures, so as to avoid the whistleblowers suffering any form of retaliation, discrimination or penalisation, also guaranteeing the anonymity of the whistleblower and the confidentiality of the facts reported by the same, without prejudice to legal obligations and the protection of the rights of Webuild.

Useful references

Company documents¹:

- Code of Ethics
- Sustainability Policy
- Quality Policy
- Occupational Health and Safety Policy
- Environment Policy
- Human Rights Policy
- Equality, Diversity and Inclusion Policy
- Anti-Corruption Policy and Model

Guidelines, principles and international standards:

- OECD guidelines for multinational enterprises
- United Nations Global Compact
- ISO 9001 on quality management systems
- ISO 45001 on occupational health and safety management systems
- ISO 14001 on environmental management systems
- ISO 37001 on anti-bribery management systems
- IFC's Environmental and Social Performance Standards (World Bank Group)
- UN Guiding Principles of Business and Human Rights

¹ Available on the website <https://www.webuildgroup.com>

Webuild S.p.A.

www.webuildgroup.com

www.webuildvalue.com

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Webuild Corporate Identity, Communication and Institutional Affairs

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Webuild Image Library

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