

code of : conduct

first edition

SUPPLIER SUSTAINABILITY AGREEMENT

Remember what matters, support one another, walk together. Like an elephant: with a strong memory, team spirit and a steady step.

The Code of Conduct is an ethical agreement between Hera and its suppliers, to work together in building a sustainable, fair and responsible value chain.



code of  conduct

SUPPLIER SUSTAINABILITY AGREEMENT

The Code of Conduct - Supplier Sustainability Agreement - first edition - was approved by the Board of Directors of Hera S.p.A. on 25 June 2025.

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Introduction

Definitions

Hera

The Hera Group as a whole and its various corporate and organisational subdivisions.

Suppliers

All people and companies that, individually or as part of a chain also comprising all subcontractors, supply the goods and services required to carry out Hera's activities and thus contribute to reaching its goals (including all subjects who are part of temporary associations of enterprises and consortia). This covers all qualified suppliers and economic operators who participate in tenders and/or have agreements or concessions with Hera.

Value chain

The ecosystem formed by different economic actors who contribute, in one or more business areas, to creating value through commercial exchange, contractually defined collaborations or informal relationships.

The Code as an agreement between Hera and its suppliers

Hera pursues sustainability and social responsibility in its business activities, but is also aware that these objectives can only be achieved if the companies forming its value chain also adopt similar behaviour.

This value chain is a crucial structure for the economy and society, and as such must be improved through a commitment to shared governance that aims at a balance between business relations and ethical considerations, and that always takes into account the social and environmental consequences of business activities.

Hera therefore initiated a dialogue with its suppliers, especially its most consolidated collaborators, to share intentions and rules regarding sustainability and business ethics. This Code is the outcome of the ensuing discussion and agreements.

The understanding between Hera and its suppliers is based on the observation that contracts cannot cover all aspects of their relationship, especially when sustainability is involved. Therefore, an ethical agreement was established that goes beyond the limits of contracts and takes into consideration the various possible relationships within the value chain.

Hera requires all its suppliers and their employees to respect the principles of this Code and to commit themselves to applying it to their own value chain as well, in order to improve its operation and create an increasingly sustainable ecosystem.

More specifically, compliance with this Code is required of both direct suppliers and their subcontractors (including all parties that are part of temporary associations of enterprises and consortia).

Guiding principles

The content of this Code is based on the Hera Group's purpose, mission, values, operating principles and Code of Ethics.

Hera's purpose is as follows:

"The Company's business model aims at creating long-term value for its shareholders through the creation of a shared value with its stakeholders.

For this purpose, the Company organises and carries out its business activities also in order to promote social equity and contribute to achieving carbon neutrality, the regeneration of resources and the resilience of the services system managed for the benefit of customers, the ecosystem of its territory and future generations. (Hera for the Planet, People and Prosperity)."

Hera has defined the values and operating principles that guide its activities and the people who, in various capacities and with different responsibilities, directly or indirectly achieve the following aims, which Hera asks its suppliers to adopt:

- *integrity, transparency, personal responsibility and coherence* are the values promoted by Hera on a daily basis;
- *sustainability and shared value, service quality and excellence, efficiency, innovation and ongoing improvement, engagement and valorisation along with the will to choose* are the operating principles aimed at achieving Hera's strategic objectives.

These elements form the basis for the ongoing development of Hera's Code of Ethics, in which these values and principles are described in detail.

In addition, the Code of Ethics contains a specific chapter devoted to Hera's commitments and responsibilities towards its suppliers, including: the management of relations based on respect for the aforementioned values and principles, and the improvement of environmental and social sustainability in the process of qualifying, monitoring and assessing suppliers.

The objective of this Code is to define these issues from the suppliers' point of view, in order to complete the correspondence between Hera's commitments and those taken on by its suppliers, from the shared perspective of sustainability.

The purpose agreed upon between Hera and its suppliers is:

to improve the value chain in terms of sustainability, equity, transparency and efficiency.

From the Hera Group's Code of Ethics: ethical references for suppliers



RESPONSIBILITY

Operating as a business while considering the consequences for those who work within it, the environment and communities.



INTEGRITY

Being honest and fair in decisions, behaviour and relations, even when under pressure.

Sustainability and



TRANSPARENCY

Being clear and comprehensive in communication, information management and stakeholder relations.



COHERENCE

Saying what one does and doing what one says in a concrete way, fulfilling one's commitments.

shared value

Structure of the Code

The Code is organised into four sections that represent the ethical vision and the prospective commitments agreed upon by Hera and its suppliers.

Sections 1, 2 and 3 deal with the fundamental topics involved in ESG issues, starting with *governance* and then discussing *social* and *environmental* matters. The last section is dedicated to the *implementation* and *distribution of the Code*.

Each of the first three sections is subdivided into three parts, corresponding to the different nature of the commitments and relationships arising between Hera and its suppliers:

- **General intentions** that define the objectives behind the commitments that Hera and its suppliers intend to make in each of the areas covered.
- **Obligations and established requisites** that include, above and beyond the conditions set out by legislation and contracts, the obligations concerning performance and the binding rules defined by Hera.
- **Good practices and recommended requisites** that indicate outlooks and actions which, while not representing actual obligations, are required of suppliers; Hera is committed to encouraging them, in order to achieve its sustainability goals and greater efficiency along the value chain.

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Commitments to governance and proper management





Governance

Solid governance is what allows sustainability to be more than an intention, **becoming a method and a corporate culture.**



General intentions

Hera and its suppliers are committed to complying with international laws and conventions on business ethics, which ensure effective and transparent management, reporting and communication, as well as constant dialogue and mutual cooperation.

These commitments must be promoted and distributed along the value chain, where the compatibility and integration of business and ethical aspects is crucial for business development and the well-being of all stakeholders involved.

Hera and its suppliers are committed to building professional and human environments based on legiti-

macy, seriousness and honesty, preventing risks and correctly handling cases of active and passive corruption and fraud. For these purposes, they adopt the judgement and actions of those who act out of ethical conviction, as well as respect for the law.

Hera and its suppliers are committed to integrating policies and actions for the identification, prevention and management of ESG risks within corporate strategies, building responsible relationships throughout the value chain and adopting internal and supply chain control systems to ensure compliance with the principles defined in this Code.

Obligations and stipulated requisites

Hera's image and reputation

Suppliers contribute to building Hera's image and reputation. The quality of Hera's relations with its stakeholders also depends on the conduct of suppliers and their staff, who are required to behave in a manner consistent with this Code. In carrying out its activities, the supplier shall refrain from any behaviour that is detrimental to Hera's image or that may result in sanctions or reputational damage.

Relations with Hera

Suppliers shall not unduly influence the Hera representatives with whom they have relations and shall refrain from any unjustified interference with decision-making processes related to qualification procedures, contract awarding and management, contractual default management, accounting records or subcontracting authorisation.

Conflict of interest

If the supplier, or one of its employees or collaborators, has a conflict of interest with Hera, it must declare this to the Hera personnel having a position of responsibility with respect to the procedures in question and refrain from gaining any undue advantage.

Competitiveness

Suppliers shall not distort competition through collusion, price agreements or other means of manipulating the market and shall refrain from unduly influencing the selection process. They shall not exchange information concerning their relations with Hera and shall not form groupings or other arrangements that restrict the right of others to compete in the market.

Transparency

Suppliers shall ensure the quantity, quality and transparency of the information necessary to carry out the processes concerning them, including information on their corporate structure and operational capabilities.

Similarly, they shall not omit information that, on account of its significance, may affect their qualification for or the award of a contract, and shall rapidly disclose any situation or condition that may conflict with the interests of the contractor.

Channels for relations

Suppliers shall avoid contacting Hera personnel outside official communication channels or in an untraceable manner.

In addition, suppliers shall give preference to direct relations with the procurement personnel in the respective process, avoiding any kind of interaction or negotiation outside the specified channels.

Due diligence and anti corruption and fraud

Suppliers shall avoid any activity contrary to correct business relations and, in particular:

- refrain from any request or solicitation of favourable exchanges aimed at Hera staff (active bribery) or reject it and report it to Hera so that the company can take appropriate measures (passive bribery);
- avoid conduct and practices that may be construed as fraud or in any case acts in violation of rules and regulations;

- establish due diligence assessments to prevent or detect cases of active and passive corruption and fraud in commercial agreements with their subcontractors for services or goods commissioned by Hera including partnerships, concessions, joint ventures, and hiring third party intermediaries as agents or consultants.

For these purposes, they shall adopt, both internally and with respect to their own value chain, a system of risk prevention, including training, organisational methods and regular control systems, and promote a corporate culture based on ethics and responsibility.

In the event of any suspicion of corruption, fraud or other illegal act, they shall report it to Hera through the portal segnalazioni.gruppohera.it.

Gifts and benefits

Suppliers shall refrain from promising, offering, giving or receiving gifts or other gratuities (including, for example, hospitality, meals, attendance at events, etc.) that may be construed as falling outside the scope of normal business courtesy or otherwise aimed at obtaining favourable treatment.

Any gifts or other gratuities must therefore have a modest value and must not be such as to compromise the integrity and/or reputation of one of the parties, i.e. construed as being intended to create obligations based on gratitude or to acquire improper advantages. If the donation or gift involves an Italian or foreign public official or other person belonging to a public administration, it must be managed in accordance with the Hera Group's Model for the Prevention of Corruption and Fraud and the Code of Conduct of the entity to which the person belongs.

Protection of data, information and intellectual property

Suppliers shall ensure that information, of which they have come into possession as a result of their role, receives an appropriate level of protection. To this end, they shall establish the necessary security safeguards. They shall likewise respect intellectual property rights and process personal data in accordance with the General Data Protection Regulation (GDPR) and applicable national regulations.

Risk of supply chain interruption (business continuity)

Suppliers shall ensure the business continuity of their activities through an appropriate assessment of any risks that could interrupt the supply chain and take care to avoid any form of dependence on their suppliers and/or customers.

In particular, they shall carefully consider all risks, including logistical and emerging risks, such as climatic and geopolitical factors. This commitment serves to ensure the quality and timeliness of supplies, thus supporting the reliability and sustainability of the entire supply chain.

Consequently, suppliers shall develop mitigation plans to ensure that interventions are introduced to reduce the impact of adverse events on the availability of products and services.

Ethical risk in the supply chain

Suppliers shall pay particular attention to avoid sourcing the products and services necessary for their business from countries and contexts where behaviour contrary to that promoted by this Code is more likely to occur, including disrespect for labor and human rights, bribery and other incorrect ways of operating. Any such occurrences in the supply chain must be strictly controlled and avoided. In particular, suppliers shall adopt selection criteria and monitoring mechanisms consistent with this Code.

Good practices and recommended requisites

Hera values suppliers who, to improve their own governance and that of the entire supply chain, are committed to the communication and promotion of best practices, and in particular those who:

- adopt a management system for the prevention of corruption compliant with ISO 37001, with accredited certification;
- adopt an information security management system compliant with ISO 27001, with accredited certification;
- adopt a transparent, ethical and virtuous business management certified through the legality rating issued by AGCM;
- adopt a Model for the Prevention of offences pursuant to Legislative Decree 231/2001, a 231 Supervisory Board and a Code of Ethics;

- make use of tools to communicate their non-financial results, such as publishing a sustainability report and/or obtaining an ESG rating from an external info-provider;
- define social and environmental sustainability and governance objectives, ensuring that they are monitored through shared indicators and regular reviews;
- valorise and communicate their virtuous experiences in a structured way, contributing to the adoption of replicable practices along the supply chain;
- integrate internal incentive systems linked to achieving ESG objectives, both at company and individual level;
- activate structured contexts for debate and workforce participation to define sustainability practices and objectives, flanking these activities with training and awareness-raising initiatives for their people, suppliers and new generations (e.g. schools) to encourage a culture of sustainability (e.g. environmental education, occupational health and safety, inclusion, legality, etc.);
- participate in the activities promoted by Hera, such as capacity building initiatives, training and discussion meetings, workshops, conventions and round tables, actively contributing with their know-how and thus fostering a continuous and shared improvement of the supply chain's ESG performance.

2 | Social commitments





Social

Suppliers and the people they work with are not simply producers of goods and services: **they are living environments**, to be planned, guided and protected.



General intentions

Hera and its suppliers consider work as one of the highest manifestations of human values, which are at the root of its activities. They believe that work is a means of growth and improvement for people and their communities, and thus strive to recognize its full value and reduce the risks and threats that have accompanied it in the past. In particular, Hera and its suppliers reject and oppose all kinds of exploitation: child labor, forced labor, exploitation of migrants and victims of trafficking and any other category who for physical, political, religious or gender-related reasons is more exposed to losing their rights.

Likewise, they oppose all forms of discrimination, violence and harassment and are committed to creating working environments that protect the rights and dignity of people and support their professional development and personal fulfilment. They therefore promote, both internally and along the value chain, training, balance between professional and family life, dialogue and opportunities for cooperation, and a widespread adoption of the best professional, business and human behaviour.

Obligations and stipulated requisites

Prohibition of child labor

Suppliers shall exclude child labor, noting that:

- the minimum age for employment is the age at which compulsory education ends;
- persons under the age of 18 are considered minors to be protected, and must therefore not engage in work that, by its nature or the circumstances under which it is carried out, may endanger their health and physical and moral safety.

Prohibition of forced labor

Suppliers shall reject the economic exploitation of people, and to an even greater degree shall not tolerate forced labor or other forms of modern slavery: compulsory labor, human trafficking,

domination or oppression in the working environment.

Similarly, they shall not impose work or services under threat of punishment, or for which the persons working have not voluntarily made themselves available, and shall never use forced labor as a punishment.

Fair remuneration

Labor must be properly contextualized and fairly remunerated by suppliers, starting with compliance with contracts and regulations, and including a specific assessment of the correspondence between the work carried out and its monetary value.

The wages established shall be paid on time and in a traceable manner. Unauthorised deductions from wages are therefore excluded and legal contributions must be paid. Any deductions from wages used as a disciplinary measure must be consistent, documented and managed according to regulations and contracts.

Employees must be able to apply for and obtain social benefits in accordance with the law.

Working conditions and hours

Suppliers shall ensure that working conditions, remuneration and working hours, travel and any benefits at least comply with national legislation, industry standards and the provisions of specific collective agreements and are defined in a written agreement at the time of employment.

The supplier shall always organise working hours in such a way as to prevent accidents due to physical and mental fatigue and thus preserve the health of the people at work, paying particular attention for example to shift management, overtime and periods of leave, and ensuring the necessary time for rest, which may not be less than 24 consecutive hours every seven days.

Overtime

Overtime may not exceed the limit set by law and, barring exceptions dictated by emergencies, may not be used on a permanent basis.

If no legal minimum wage or overtime premium exists, wages must be at least equal to the average minimum wage for the sector and overtime must be remunerated above the regular hourly rate.

Equality and non-discrimination

Equal performance must be matched by equivalent pay. However, this correspondence does not only concern economic aspects, but also every other element associated with work, such as selection criteria, working conditions or opportunities for career advancement and professional development.

With respect to these issues, there may be no discrimination based on a person's characteristics such as age, gender, identity, ethnicity, political and religious beliefs, social origin, skin colour, physical and health conditions, sexual orientation or any other condition that may give rise to discrimination.

Respect for diversity and communities, inclusion

Sensitivity to diversity and inclusion is a necessary behaviour in order to innovate and improve. Indeed, work always takes place and manifests itself in places, contexts and circumstances that correspond to certain human communities. Therefore, respect for their rights and culture must be considered a necessity and an obligation for those working along the chain.

Protection from violence and harassment

Workers must be treated with dignity and protected from harassment, intimidation, blackmail and violence, in all its forms: physical, verbal, digital and psychological. This applies to peer relations between employees and even more so where there is a difference in authority and power between workers.

The authority of those with management and co-ordination tasks shall always be manifested in an appropriate manner towards co-workers and employees.

The responsibility of management, including issuing instructions, ensuring discipline and exercising correction, excludes any manifestation that is not characterised by human respect.

Freedom of association and speech

The workplace must be conceived as being characterised by responsibility, order and discipline, but at the same time it must make room for freedom of expression and the organisation of interests.

Suppliers shall respect the fundamental right of each employee to form or join organisations of his or her choice to engage in collective bargaining and shall not permit any violation of the freedom of association.

Worker representatives must be protected against all forms of discrimination and must be guaranteed free access to workplaces in order to be able to carry out their function.

Suppliers shall regularly pay any dues withheld from their employees who are union members.

Occupational health and safety

Suppliers shall ensure safe working environments and adopt measures for prevention and protection that encourage responsible health and safety behaviour, and shall therefore:

- promote the development of a culture of prevention by eliminating or minimising hazards and risks in order to prevent occupational accidents and illnesses;
- ensure that employees are adequately trained, informed and instructed;
- periodically check safety conditions and the level of their personnel's training, awareness, preparedness and emergency response capability;
- provide staff with a safe and healthy working environment with adequate and clean changing rooms and toilets;
- provide their personnel with suitable devices and equipment, in compliance with safety requirements and in adequate quantities;
- provide their personnel with protective equipment consistent with an appropriate risk assessment;
- actively cooperate in ensuring cooperation and coordination among prevention and protection measures, against risks due to interference between tasks carried out by the various companies involved in the overall work;
- promptly notify Hera of any information and incidents occurring during the performance of their activities, and provide an annual report on this matter. Hera reserves the right to initiate a more in-depth analysis, in cooperation with the supplier, to identify the causes of the event and the corrective and preventive actions necessary to avoid its recurrence.

Good practices and recommended requisites

Hera values suppliers who, in order to improve their performance in the area of social sustainability:

- adopt an occupational health and safety management system, compliant with ISO 45001, with accredited certification;
- adopt a management system for corporate social responsibility, compliant with SA 8000 or PAS 24000, with accredited certification;
- adopt an equality management system in accordance with UNI/PdR 125, with accredited certification;
- promote a safety culture that will progressively reduce the accident rate;
- recognise and enhance the strategic role of key figures in occupational safety, especially those having responsibility, by adopting specific training, incentives and rewards linked to their active commitment to risk prevention;
- adopt employment policies aimed at ensuring stability in the medium/long term for their employees;
- implement actions for concrete improvement intended for staff: second-level wage agreements, bonus systems, training programmes, distance working, parenting and work-life balance policies, support for vulnerable employees, inclusion of disabled and disadvantaged workers, meal vouchers (or allowances), internal climate surveys, dedicated listening channels and, in general, corporate welfare systems;
- activate partnerships with local figures to promote the working inclusion of people in fragile conditions, including through joint training and development initiatives;
- promote internal initiatives intended for workers, their families and the community aimed at encouraging inclusion, dialogue and an appreciation of cultural and generational diversity;
- activate professional retraining and internal redeployment paths for personnel in positions at risk of obsolescence, with the aim of promoting active inclusion including during phases of technological and/or organisational changes;
- implement corrective actions and measures in the event of anomalies detected during periodic monitoring and/or audits by Hera;
- share the findings of the analysis of their own incidents (lesson learned).

3

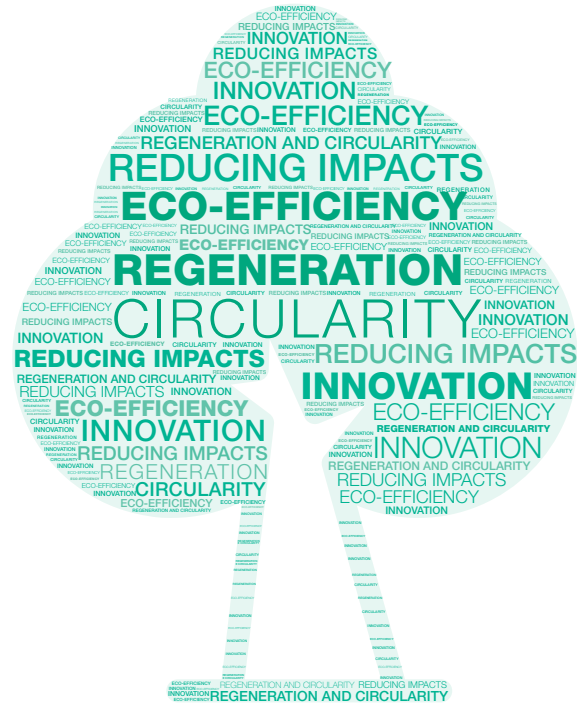
Environmental commitments





Environment

It is not merely a question of limiting the damage. What is required is a **contribution to regenerating resources** for future generations, going beyond the simple concept of conservation.



General intentions

Hera and its suppliers recognise the environment as a primary collective good and work towards protecting it, for a just ecological transition, the protection of biodiversity and the preservation of resources for the benefit of present and future generations. Therefore, they ensure efficiency in the use of natural resources and prevent pollution to reduce their environmental impact and contribute to achieving carbon neutrality; they furthermore promote energy efficiency and a wider use of renewable energies.

For these purposes, they adopt appropriate environmental and energy management systems and develop initiatives that combat deforestation and promote land protection, resource regeneration and the circular economy.

Obligations and stipulated requisites

Reducing emissions

In carrying out their activities, suppliers shall adopt technologies, procedures, working methods and equipment that minimise atmospheric emissions including dust, gases, vapours and odours. Special efforts shall be made to control emissions of greenhouse gases and ozone-depleting substances.

In all activities, particularly during the use of vehicles and equipment, practices must be adopted to minimise possible emissions into the atmosphere. In the event of an incident, all necessary measures must be taken to avoid or minimise the generation of atmospheric emissions.

Water conservation

Suppliers shall use water responsibly and seek to reduce the exploitation of water as a resource, for example by reusing water from production process, and to return water of appropriate quality to the environment, for example by including wastewater treatment plants in their factories.

Energy consumption

Suppliers shall show constant commitment to improving the management of energy resources. In carrying out their activities, they shall avoid waste and pursue savings and efficiency, in line with Hera's "Quality and Sustainability Policy".

When purchasing energy services, products and equipment that have or may have a significant impact on energy consumption, suppliers shall make choices based on criteria including the specific energy requirements of these supplies. Suppliers may send comments or suggestions to the e-mail address proposteISO50001@gruppoHERA.it to actively contribute to the improvement of the Energy Management System.

Waste management and reduction

Suppliers shall handle waste in accordance with current legal requirements and always avoid harming the environment, not abandoning any kind of waste and always disposing of it with proper management and identification. All waste produced, including any residual processing waste, shall always be delivered to authorised facilities. In line with the principles of the circular economy, suppliers adopt procedures to minimise waste production and maximise the value of the materials used, promoting their most efficient use. Actions aimed at material reduction and reuse are preferred to recycling or recovery.

Use of hazardous substances

Where possible, suppliers shall seek alternative solutions to reduce the risks, whether actual or potential, arising from the use of hazardous substances in their activities. This may be done by

replacing a substance with a less hazardous one, by using alternative techniques and work processes, or by changes in planning.

Particular attention must be paid to concerning and extremely concerning substances (e.g. carcinogenic, mutagenic, toxic for reproduction...). Especially when linked to the use of concerning substances, suppliers shall adopt reporting systems for the different classes of hazardous substances.

No substance may be introduced into sewers and, in general, suppliers shall adopt procedures for managing emergencies related to hazardous substances (e.g. spills or other accidental releases), which shall include ways to contain possible impacts on people and the environment.

Use of plastics

Suppliers shall undertake to reduce consumption of single-use plastics and to favour the use of recycled materials, to contribute to reducing microplastic pollution.

Good practices and recommended requisites

Hera values suppliers who, to improve their performance in the area of environmental sustainability:

- adopt an environmental management system in compliance with ISO 14001, with accredited certification, or with EMAS registration;
- adopt an energy management system in compliance with ISO 50001, with accredited certification;
- favour the use of renewable energy sources in their activities and production processes, setting targets to increase the percentage of clean energy used and implementing concrete actions to monitor and improve its effectiveness over time;
- set targets for the renewal of their vehicle fleet, purchasing low-emission vehicles and demolishing obsolete vehicles, favouring a more

- environmentally friendly and safer vehicle fleet;
- promote and adopt sustainable mobility practices, such as car sharing, car pooling and other alternative solutions;
- adopt systems for calculating or estimating their greenhouse gas emissions according to recognised standards, and define reduction objectives and targets aligned if possible with the Science Based Targets initiative and carbon neutrality/Net Zero targets;
- implement concrete initiatives to reduce and compensate for their greenhouse gas emissions;
- implement circular economy and eco-design models, including through increasing the recycled/biological component of input materials or regenerating products, returning and reusing components and adopting shared-use programmes (e.g. leasing, pay-per-use), thus reducing greenhouse gas emissions, extending the useful life of the resources used and mitigating the risk of supply continuity;
- favour the use of materials certified for a reduced environmental impact (e.g. FSC, EPD, Cradle to Cradle), tracking the origin and environmental characteristics of the raw materials used.

4

Implementation, distribution, references





Implementation

Acting as leaders in an efficient and fair value chain: sustainability cannot be imposed, it must be built together, because it is not simply conformity, but **a way of doing business.**



Accepting and signing the Code

Suppliers must sign this Code in order to be qualified or carry out the role of contractor and/or sub-contractor.

Distributing and implementing the Code

The Code must be fully implemented through concrete actions aimed at acting on the principles it contains, including through its distribution and application along the entire value chain (e.g.: requesting subcontractors, principals and consortia parent companies to sign this Code). Similarly, suppliers shall undertake to provide reporting on their own sustainability performance and to respond to requests for data and information useful for drawing up the Hera Group's sustainability reporting, pursuant to European regulations.

Use of the Code and reporting channels

This Code is a pact based on trust between Hera and its suppliers. Any behaviour not in compliance with the Code is considered a breach of the pact. Anyone, inside or outside the organisation, who perceives a violation of this Code can contact Hera's Ethics and Sustainability Committee or the whistleblowing channel.

The Hera Group's Ethics and Sustainability Committee can be addressed via the following channels:

- ordinary mail addressed to the Ethics and Sustainability Committee Hera S.p.A. Viale Berti Pichat 40127 Bologna;
- email comitatoetico@gruppohera.it or PEC to the comitatoetico@pec.gruppohera.it;
- reporting portal of the Hera Group's Ethics and Sustainability Committee www.gruppohera.it/scrivi-al-comitato-etico;
- verbal report to one of the members of the Committee.

For all other details on the operation of the Ethics and Sustainability Committee, please refer to the chapter in question of the Hera Group's Code of Ethics.

Any suspected breach of the Model for the prevention of corruption or fraud, the Model 231 or other alleged offence, fraud, corruption or other illicit behaviour, including in the area of gender equality (e.g. harassment), and any other information useful for preventing offences may be reported to the whistle-blowing body through the following channels:

- the whistleblowing reporting portal of the Hera Group's Internal auditing department - Hera Group (segnalazioni.gruppohera.it);
- ordinary mail addressed to Direzione Internal Auditing Hera S.p.A. Viale Berti Pichat 40127 Bologna with the indication "Confidential" on the envelope;
- verbal report, by appointment to be requested by e-mail to presidente.odv@PEC.gruppohera.it or by using the portal.

Possibility of verification by Hera

Hera, consistently with the commitments made in its Code of Ethics, carries out, according to the defined procedures, monitoring and control activities on suppliers' compliance with this Code. This is done by requesting documentary evidence or specific indicators, or again through specific audits.

It should be noted that non-compliance with the obligatory parts of this Code will lead to opening non-compliance and related remedy plans, as per the applicable Hera procedures. Depending on the level of severity, any breach of this Code may lead to contract termination and temporary suspension or permanent blocking from the supplier list.

Valorisation of good practices and recommended requisites

The good practices adopted by suppliers, their adoption of the recommended requisites, commitment to distributing the Code and communication of their own sustainability performance may be valorised by Hera within its predictive qualification rating or tender scoring models. Moreover, visibility

may be given, in Hera's institutional communication or at dedicated events, to particularly virtuous conduct in the implementation of this Code.

Revision of the Code

The contents of this Code will be verified and, if necessary, revised when conditions so require.

International references

This Code is consistent with the contents of a number of international reference texts on human rights, labor rights and environmental protection: the United Nations Guiding Principles on business and human rights; the International Labor Organisation (ILO) Declaration on fundamental principles and rights at work and its eight core conventions; the United Nations International Bill of Human Rights; the OECD Guidelines for multinational enterprises, the European Union's Charter of Fundamental Rights and its directives and guidelines on environmental protection and resources. Furthermore, the goals contained in the UN 2030 Agenda for Sustainable Deve-

lopment and the Global Compact guidelines on environmental sustainability served as a guide for drafting this Code.

Hera document system

In addition to what is defined in this Code, attention must go to the following Hera Group documents that suppliers are required to accept:

- **Quality and sustainability policy**, which summarises the objectives and commitments for the implementation of certified management systems;
- **Model for the prevention of corruption and fraud**, which indicates the behaviour required from all persons working for Hera in order to prevent corruption and fraud;
- **Organisation, management and control model pursuant to legislative decree 231/2001**, which concerns prevention methods for the offences referred to in the aforementioned legislative decree as well as the role of the Supervisory Board;
- **Personal data protection policy**, which covers commitments to personal data security and protection.

Design and coordination of Hera S.p.A.'s publishing project:

Purchasing and Procurement Department

Shared Value and Sustainability Department

Quality, Safety and Environment Department

Internal Auditing Department

Central Communication and External Relations Department

Graphic design:

Koan multimedia

Photos:

Andreas Edelmann, Karlos Lomsky, Timon, Matthias - stock.adobe.com

Further modifications made by the agency Koan multimedia

Printing:

Grafiche Antiga

This Code was printed on Fedrigoni Life Eco100 paper,

which is 100% recycled and FSC® certified.

Printing this Code was Carbon Neutral, thanks to the Gold

Standard Cookstoves project in Chamanculo C, Maputo (Mozambique).

Printed in June 2025