Supplier Code of Conduct

Integrity, safety, respect for people and the environment: the values we share with those who work with us.

AT A GLANCE

What this is about
The rules of conduct that La Molisana Trasporti S.r.l. asks of its suppliers, in line with the ten principles of the United Nations Global Compact.

Who it applies to
Suppliers and subcontractors, and any third party working on their behalf.

What you must do
Read the Code, sign it and apply it. Make sure subcontractors and third parties comply with it.

How to report
Verbally, through the "Reports" platform on the website, or by mail to C.da Lecine 30, 86014 Guardiaregia (CB).

Who we are and what we expect

For over 30 years La Molisana Trasporti S.r.l. (hereinafter "Molisana Trasporti") has been one of the most important Italian companies in the field of exceptional transport, with a particular focus on wind power, where, thanks to the experience gained and the equipment available, it is the market leader.

We are working to build sustainability into everything we do, from safety to the environment. We extend this expectation to our suppliers (hereinafter also "Recipients") and are committed to supporting our supplier network to improve shared sustainability performance. In Italy and in Europe, we work with suppliers who share our values of integrity, honesty and fairness: values that can be fully pursued only if shared with all our partners.

We ask suppliers to sign and accept this Code and to act in accordance with its provisions. All suppliers must also ensure that their subcontractors, and any other third party working on their behalf, operate in full compliance with the Code.

In the supplier selection process we carry out due diligence to identify and manage potential risks. We expect suppliers to avoid causing or contributing to adverse human rights impacts, in their country and in the local communities where they operate. We encourage them to support inclusion and respectful workplaces, to proactively manage risks in the supply chain and to take into account the human rights of all stakeholders.

Recipients must operate in compliance with the laws and regulations in force in the context in which they operate, with the principles of the Code and with the commitments made to the Company. If the provisions of the Code and those of applicable laws conflict, the stricter requirement applies, provided it does not violate applicable legislation.

What happens if the Code is not followed

1. **We correct the non-compliance**
   If a supplier breaches the Code or does not implement it adequately, we correct it within a reasonable period and consider suspending or terminating the commercial relationship.

2. **The supplier remedies**
   The supplier must implement corrective measures and remedy the breach within a period agreed with the Company and consistent with the type of non-compliance.

3. **Serious breach**
   In the event of unjustified delay or omission, or repetition of the breach, the Company may regard it as a serious breach of the duties of fairness and good faith in performing the supply contract, which destroys the relationship of trust and is just cause for termination, without prejudice to the right to compensation for damages.

The United Nations Global Compact

Molisana Trasporti adheres to the United Nations Global Compact (UNGC), the voluntary initiative that invites companies worldwide to align strategies and operations with ten universally recognised principles on human rights, labour, the environment and anti-corruption, and to contribute to the Sustainable Development Goals (SDGs) of the 2030 Agenda. With this Code we adopt the ten principles and ask suppliers, subcontractors and third parties working on their behalf to share, respect and promote them throughout the supply chain.

Human rights · principles 1-2

- Support and respect internationally proclaimed human rights within their respective spheres of influence.
- Make sure not to be complicit, even indirectly, in human rights abuses.
- In the Code: Human rights (health and safety; labour rights).

Labour · principles 3-6

- Freedom of association and the right to collective bargaining.
- Elimination of forced and compulsory labour.
- Effective abolition of child labour.
- Elimination of discrimination in respect of employment and occupation.
- In the Code: Labour rights.

Environment · principles 7-9

- A precautionary and preventive approach to environmental challenges.
- Initiatives to promote greater environmental responsibility.
- Development and diffusion of environmentally friendly technologies.
- In the Code: Respect for the environment.

Anti-corruption · principle 10

- Work against corruption in all its forms, including extortion and bribery.
- In the Code: Working with integrity and honesty (bribery and facilitation payments; gifts and hospitality; conflict of interest).

Human rights

Health and safety

We are committed to improving health and safety standards throughout the supply chain. In contracts we describe the objectives and minimum health, safety and environment (HSE) requirements that suppliers must meet when working for us. Suppliers must never compromise safety or feel obliged to take shortcuts to achieve business objectives. When accidents occur at a supervised contractor, we record and investigate them to reduce the risk of recurrence.

What does this mean for the supplier?

- Provide a safe and healthy workplace. All employees must receive the mandatory health and safety training and the personal protective equipment (PPE) they need. Training, supply and maintenance of PPE must be at no cost to the employee.
- Implement a robust safety management system, with policies, risk assessment, incident monitoring and safety committees.
- Develop the best emergency preparedness measures, adapted to specific activities, places and circumstances.
- Provide adequate first-aid solutions, medical support facilities and resources.
- Ensure that employees are not under the influence of drugs or alcohol.
- If on-site accommodation is provided, it must be adequate and safe, taking gender and cultural differences into account and allowing privacy and well-being.
- Living conditions must comply with local and national laws, industry standards and relevant collective agreements, where applicable.
- For unsupervised contractors, all accidents must be recorded and investigated by the contractor.

Labour rights

Modern slavery

We never allow the use of modern slavery or human trafficking in our activities and we expect suppliers to take diligent and reasonable steps to prevent these violations within their own supply chain.

Modern slavery is any work or service demanded of a person under threat of punishment and for which the person has not offered themselves voluntarily. It can take many forms: slavery, servitude, forced or compulsory labour, coercive and deceptive recruitment, debt bondage and human trafficking. Even practices such as compulsory overtime may be considered modern slavery.

What does this mean for the supplier?

- Do not take part in or benefit from modern slavery or human trafficking in any form. All work must be voluntary.

- ✓ Guarantee all employees freedom of movement during employment and the right to terminate employment at any time, with reasonable notice.
- ✓ Do not withhold wages, identity cards, travel documents or other important documents that may prevent employees from ending their employment or moving freely.
- ✓ Do not charge recruitment fees or require deposits from employees. Ensure that no labour costs are charged, in whole or in part, to any employee.
- ✓ If a contractor is used for recruitment or employment services, carry out due diligence to ensure it is not involved in any form of modern slavery.

Child labour

We do not accept the use of child labour in our supply chain in any way, in line with the conventions of the International Labour Organization (ILO) on the minimum age for admission to employment and on the worst forms of child labour.

Child labour means the employment of persons who have not reached the minimum legal age for entering work under the applicable national legislation and, in any case, not below the age at which compulsory schooling ends, subject to the limited exceptions of the ILO conventions. All forms of hazardous child labour, or labour that may compromise the health, safety or physical, mental, moral or social development of minors, are also prohibited.

✓ **What does this mean for the supplier?**

- ✓ Do not employ, directly or indirectly, workers below the legal minimum age under applicable national legislation or, if higher, the relevant ILO conventions.
- ✓ Verify workers' age at hiring with valid identity documents and keep documentary evidence.
- ✓ Never employ minors in hazardous tasks, in night work or in conditions that may harm their health, safety, education or development.
- ✓ If minors are employed where the law allows it, ensure that tasks, hours and conditions fully comply with the rules protecting minors.
- ✓ If a case of child labour is identified in your own organisation or supply chain, take prompt corrective measures in the best interests of the child.

Working conditions

We comply with applicable laws, industry standards and collective agreements on working hours, rest periods, pay and benefits (including leave) and we expect suppliers to do the same. If local and national standards and those of Molisana Trasporti differ, the higher ones prevail.

✓ **What does this mean for the supplier?**

- ✓ Pay wages that meet at least the minimums required by national law. If there is no statutory minimum, comply with commercial or industry standards or the collective agreements of the country in which you operate.

- ✓ If no set rates or conditions apply, pay rates and observe conditions not lower than the general levels observed locally by comparable employers.
- ✓ Ensure that working hours fall within the limits of law or applicable collective agreements.
- ✓ Ensure rest breaks in line with the law and at least one day off for every six consecutive working days.
- ✓ Provide social benefits that meet at least national or local legal requirements; in their absence, applicable industry standards or collective agreements.
- ✓ Provide employees with a pay statement showing the hours worked in the pay period and the rate of pay in accordance with applicable laws, in a language understandable to all.
- ✓ Ensure that employees have the work permits, certifications and other documents needed to work for Molisana Trasporti.

Freedom of association and collective bargaining

We support constructive dialogue and respect employees' right to freedom of association and collective bargaining. Freedom of association is the right of all employers and employees to form and join groups freely and voluntarily to promote and defend their professional interests. Collective bargaining is the voluntary process by which employers and employees discuss and negotiate employment relations, in particular terms and conditions.

✓ **What does this mean for the supplier?**

- ✓ Respect the right of all employees to form a trade union, to join or not to join one, to freely elect their representatives and to bargain collectively. Do not interfere with or restrict this right: no intimidation or retaliation (including discrimination) for having formed or joined a union or taken part in bargaining.
- ✓ Promote communication and cooperation with employees, so that they can raise work-related concerns and discuss them with management.
- ✓ Conduct negotiations with employee representatives in good faith.

Discrimination

We are committed to ensuring a diverse and inclusive working environment, free from discrimination, and we expect the same commitment from suppliers. Discrimination is unfair treatment based on an employee's characteristics, including ethnicity, sex, gender identity, sexual orientation, age, language, religion or disability; it may occur in a single episode or in several over time, and may be directed at an employee or a group. We consider diversity and inclusion fundamental to our success and are committed to protecting the right to equal treatment and opportunities.

✓ **What does this mean for the supplier?**

- ✓ Treat all people equally, with dignity and respect.
- ✓ Do not discriminate in hiring or employment decisions, such as promotions or disciplinary action: they must be based on qualifications, skills and experience.

Harassment

We prohibit harassment in the workplace, violence, bullying and any other conduct perceived as disrespectful, offensive or humiliating, whether verbal, written, physical or psychological. Harassment is unacceptable conduct that causes, intentionally or not, physical, psychological, sexual or economic harm; it may occur in a single episode or in several, in the workplace and outside. In some jurisdictions it is illegal and may result in significant fines, reputational damage and even imprisonment.

What does this mean for the supplier?

- Promote a working environment free from harassment, violence and bullying.
- Adopt policies to prevent harassment and ensure that employees and managers receive adequate training.
- Provide a reporting system through which employees can raise concerns.

Working with integrity and honesty

Bribery and facilitation payments

We strictly prohibit suppliers, and anyone acting on our behalf, from giving or accepting bribes or incentive payments.

Bribes are money, gifts or anything of value offered to influence someone and obtain an unfair advantage, for personal or professional gain. They are illegal, damage the trust that customers and suppliers place in us and our reputation, harm the communities in which we live and work, create unfair competition and increase wealth inequality.

“Facilitation payments” are small bribes paid to public officials to secure or speed up administrative processes to which Molisana Trasporti is already entitled, for example passing inspections or obtaining authorisations or customs clearance. They may seem harmless because the sums are small and often considered part of local custom, but they undermine the efficient functioning of governments and social services.

What does this mean for the supplier?

- If you are offered or asked for a bribe, always refuse it and report it.
- When dealing with public officials on behalf of Molisana Trasporti, know all the relevant local laws.
- If you are asked for a facilitation payment, refuse and challenge the legitimacy of the request, for example by asking for a receipt. Make the payment only if you fear for your safety, and report the incident to Molisana Trasporti in any case.

Gifts and hospitality

Gifts and hospitality are a common way of expressing appreciation and building a business relationship, but they may create an expectation of a favour in return. At times they may be considered acts of

corruption and expose Molisana Trasporti and its suppliers to legal and reputational risks: even the appearance of inappropriate gifts or hospitality can damage trust.

Never

- Offer gifts or hospitality during a business commitment, a tender or a contract renewal.
- Offer gifts or hospitality with the intent of improperly influencing a transaction.
- Offer gifts in cash or equivalent, for example gift vouchers.

Yes, if

- The gift or hospitality offered to Molisana Trasporti employees is legal, appropriate, inexpensive and infrequent.
- The hospitality has a clear business purpose and connection, for example a normal lunch after a meeting.

Conflict of interest

A conflict of interest may arise when a supplier's private interests influence, or may influence, the decisions made while working for Molisana Trasporti. It is essential that activities are conducted in the company's best interest: conflicts of interest can create conditions of inequality (or the perception of them) and, if not managed, can turn into corruption. Examples: a supplier with a close relationship with a Molisana Trasporti employee, such as a friend or family member; a former Molisana Trasporti employee who becomes a supplier.

What does this mean for the supplier?

- Avoid conflicts of interest and use common sense.
- If you face a conflict of interest, handle it openly and transparently and disclose it to Molisana Trasporti.

Respect for the environment

We support a precautionary approach to environmental challenges. We assess the environmental performance of our activities and are committed to continually improving it and to promoting greater environmental responsibility. We expect all suppliers to share and support these commitments: they must comply with our environmental requirements and all relevant laws and regulations, even where our requirements are higher than local ones.

What does this mean for the supplier?

- Comply with all Molisana Trasporti environmental requirements, as defined by us.
- Identify and meet all relevant legislative and regulatory requirements.
- Keep all applicable licences, registrations and permits.

- ✓ Work under an environmental management system able to ensure continual improvement and emergency response preparedness.
- ✓ Assess the environmental performance of your activities, using resources such as energy and water efficiently, avoiding or reducing waste and emissions (including CO_2) and adopting the principles of reuse and recycling.
- ✓ Ensure that hazardous substances are used and transported in compliance with applicable rules and guidelines, with all the information included in the safety data sheets.
- ✓ Report to Molisana Trasporti all environmental incidents, near misses and hazard observations, so that they are addressed in line with our internal reporting policies.
- ✓ Promote and encourage the development, adoption and diffusion of environmentally friendly, low-impact and more energy-efficient technologies and practices, where economically and technically feasible.

Fair business practices

Intellectual property and confidentiality

Molisana Trasporti's intellectual property (IP) and confidential information are valuable assets, and we recognise equal importance and value in those belonging to others. If we do not protect them, there may be adverse financial, commercial and technological consequences, such as the loss of business opportunities and technological exclusivity; likewise, failing to respect others' IP exposes our organisation to financial, commercial and reputational risks. Suppliers help safeguard Molisana Trasporti's confidential information, documents, software, tools and technology from unauthorised use.

✓ **What does this mean for the supplier?**

- ✓ Respect and protect with care and diligence the intellectual property and confidential information created by and for Molisana Trasporti.
- ✓ Always respect the intellectual property and confidential information that belong to others.

Information security

Information is one of our most important assets and protecting it is essential. Suppliers must always act truthfully and promptly and provide Molisana Trasporti with complete and accurate information on any cybersecurity event or threat. An informed and responsible supplier is one of the most effective safeguards against digital threats in the supply chain: we cannot rely on security products or tools alone, and suppliers' good judgement plays an important role.

✓ **What does this mean for the supplier?**

- ✓ Comply with all information security controls when working with Molisana Trasporti systems and information.

- ✓ Protect Molisana Trasporti's information, including intellectual property and other sensitive business information.

Data privacy

Protecting the personal data of employees, customers, suppliers and other business partners is of vital importance to us. We are committed to processing personal data in an orderly and secure way, in compliance with data protection legislation, and we expect suppliers to share this commitment. We have adopted a data privacy policy describing how we process personal data, the measures taken and the mandatory principles we apply to collection and processing, principles we expect suppliers to respect as well.

✓ **What does this mean for the supplier?**

- ✓ Protect the confidentiality of the data of Molisana Trasporti employees and suppliers during the collection and processing of personal data.
- ✓ Comply with all applicable data privacy laws in the collection, storage, use, processing and sharing of personal data.

Competition law

We expect suppliers to respect free and fair competition and all applicable laws. Violating them can have serious consequences, not only for Molisana Trasporti but also for suppliers, who must never take part in illegal price fixing, illegal market sharing or abuse of a dominant position towards Molisana Trasporti.

✓ **What does this mean for the supplier?**

- ✓ Do not enter into anti-competitive agreements or engage in concerted practices with competitors, suppliers, customers or other business partners.
- ✓ Do not abuse a possible dominant position on the market.

Updates, revisions and reports

The Code will be updated and reviewed regularly to reflect lessons learned from the continuous improvement journey. The current version is also available on the website www.molisanatrasporti.it. Recipients and their employees, collaborators or subcontractors who become aware of conduct not in line with the Code or of alleged violations are required to inform the Company promptly.

How to report

Verbally
By telephone, through voice messaging systems or by requesting an in-person meeting.

Online platform
Via the link in the “Reports” section of the corporate website.

Mail
Ordinary or registered mail with return receipt to: La Molisana Trasporti S.r.l., C.da Lecine n. 30, 86014 Guardiaregia CB.

La Molisana Trasporti guarantees the confidentiality and security of reports, including the identity of the reporting person, without any form of retaliation, subject to legal obligations.

Document revisions

Rev. 00 · 01-04-2024
Drafted by Diego Carnevale. Approved by Margherita Berardini.

Rev. 01 · 04/05/2026
Drafted by Diego Carnevale. Approved by Margherita Berardini.

Guardiaregia, 02.12.2026

The Sole Director
Margherita BERARDINI