



ERG Group Supplier Code of Conduct

ERG Group

Approved by the Board of Directors of ERG S.p.A. on 14 November 2025

INSPIRING CHANGE TO POWER THE FUTURE



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FOREWORD

In October 2023, with the sale of the thermoelectric plants and the consequent abandonment of the method of producing electricity through traditional sources, the ERG Group¹ (hereinafter also “the Group” or “ERG Group”) completed its business transformation, becoming an independent trader in the production of electricity from totally renewable sources (wind and solar) with a growing presence abroad.

The Group’s sustainable development model integrates its business activities, conducted in an ethical and transparent manner, with environmental protection, health and safety protection, and respect for people.

Compliance with the principles of integrity, honesty, equality, confidentiality, fairness, honourableness, transparency, respect and protection, defined in the Code of Ethics, is applied both within the Group and in relationships with third parties with whom the Group comes into contact while performing its activities.

In this context, in addition to the Code of Ethics, other compliance tools have been adopted, such as the Anti-Corruption Policy, Sustainability Policy, HSE Policy, “Information Security” Policy, Gender Equality Policy, Human Rights Policy and Supplier Code of Conduct (hereinafter also “the Code”).

The Code, through its formal acceptance at the time of registration in the supplier register and upon signing the agreements of which the Code is part, defines the principles and rules of conduct with which the Recipients (as defined below) must comply, without prejudice to their full compliance with the applicable laws and regulations in force from time to time.

In fact, the Group considers it extremely important to create transparent and lasting relationships with partners in its supply chain and to share, through the Code, the values and principles by which it is inspired in carrying out its activities.

The provisions of the Code are inspired, amongst others, by the principles set out in the fundamental Conventions of the ILO (International Labour Organisation), the United Nations Universal Declaration of Human Rights, the ten principles dictated by the UN Global Compact and the global goals contained in the UN 2030 Agenda, as well as by the international principles for responsible mining, such as those defined by the OECD Due Diligence Guidelines, the IRMA (Initiative for Responsible Mining Assurance) and Responsible Minerals.

The ERG Procurement function is responsible for proposing the periodic updating of the Code, after consulting with the Organisational Units involved, based upon future events and developments that may occur inside or outside the Group, for subsequent approval by the Board of Directors of ERG S.p.A.

¹ERG Group means ERG S.p.A. and the companies directly or indirectly controlled by it.



1. SCOPE OF APPLICATION AND RECIPIENTS

All those who collaborate with the ERG Group, whether they are suppliers, contractors, subcontractors or commercial partners (hereinafter also the "Recipients") must comply with this Code as well as timely report of violations of the principles and rules of conduct contained therein. For this reason, the Group promotes its dissemination and application as part of its business relationships.

Compliance with the rules of this Code must be considered an essential part of the obligations undertaken in any capacity and for all legal purposes by the Recipients towards the Group.

The Recipients are, in turn, obliged to inform, share and illustrate the principles contained in the Code to their employees, sub-suppliers, subcontractors, auxiliaries and employees of the latter, as well as to guarantee and verify compliance with the same.

2. GOVERNANCE & BUSINESS INTEGRITY

2.1 Legal compliance

The Recipients must comply with national and international laws and regulations, together with any other international agreement applicable to the contractual relationship in place with the Group. The Recipients must also operate in compliance with the principles set out in this Code as well as the Code of Ethics and the internal rules of the ERG Group applicable from time to time.

In the event of a conflict between the provisions of this Code and those of the applicable laws and regulations, the Recipients must comply, subject to agreement with the Group, with the most restrictive requirement, provided that this does not violate the applicable legislation.

If a more restrictive requirement does not exist, the applicable legislation will apply.

2.2 Anti-corruption and anti-money laundering

The Recipients must comply with the applicable anti-corruption laws and regulations.

In particular, within the scope of the principles defined in the Code of Ethics, Sustainability Policy and Anti-Corruption Policy, the Recipients, in carrying out their activities, must ensure the utmost completeness and transparency of information, guarantee legitimacy from the formal and substantive perspective, and ensure that information provided to the public is clear and truthful, in accordance with the rules and regulations in force.

The Recipients are also required to refrain from any activity related to money laundering, self-laundering and receiving cash, goods or other utilities.

2.3 Ethical commitments and conflicts of interest

The Recipients must behave in a manner that complies with the principles of business ethics and transparency and must avoid any conflict of interest situation that could affect the commercial relationship with the ERG Group or interfere with the ability to carry out their activities impartially and for the benefit of the Group.



2.4 Respect for competition

The Recipients must comply with the applicable antitrust laws and regulations and must pursue the principles of fair and transparent competition; the Recipients are also prohibited, in carrying out their activities, from engaging in any restrictive practice or any act capable of unlawfully manipulating the market.

2.5 Protection of intellectual property and confidentiality in business conduct

The Recipients must respect the intellectual property of the Group and third parties and will be held responsible for the use or infringement of patents and/or trademarks and/or other intellectual property rights related to the use of materials, machinery or working methods employed in carrying out their activities.

In compliance with applicable laws and regulations, the Recipients must also not disclose to third parties, in any way for reasons that are not strictly related to the execution of the contract, the technical information and all confidential² and strategic information provided by the Group.

Each Recipient undertakes to protect the confidentiality, integrity and availability of such information by adopting appropriate security measures - both technical and organisational - to prevent any unauthorised access, loss, alteration or disclosure. Therefore, each Recipient:

- guarantee the correct management and classification of the ERG Group's information, in any form, verbal or written, of which they become aware for business purposes in line with the "Information Security" Policy. If there are any doubts about the nature of the information (public or confidential) acquired during the employment relationship, such information must be treated with the highest level of protection;
- guarantee the security of the ERG Group's information acquired during the collaboration relationship based on its relevance and, where necessary, carry out a risk assessment to identify appropriate security measures:
 - o adopt secure storage methods, keeping confidential information in locations protected from physical access by unauthorised third parties;
 - o adopt appropriate measures for logical access to digital information such as rules of Segregation of Duties, Minimum Privilege and Need to Know;
- must respect the confidentiality obligation with regard to the ERG Group's information even after the collaboration agreement between the parties has ended;
- promptly notify the ERG Group of any security breach of the information owned by the ERG Group.

2.6 Privacy protection

The Recipients must protect the right to privacy of other persons, using any personal data collected only for legitimate, defined and appropriate purposes, always in compliance with the laws on personal data protection and the Privacy Organisation Model adopted by the ERG Group. The Recipients must protect the personal data processed, both their own and those of third parties, by implementing appropriate organisational and security measures, ensuring that they have sufficiently trained the persons authorised to process and have correctly identified the privacy roles within the scope of execution of their activities and services.

²All drawings, specifications and other technical and non-technical documents made available by the Group to the Recipients and which remain the property of the Group and can be used only and exclusively for the execution of the contractual relationship.



3. HUMAN RIGHTS, FOCUS ON WORKERS AND LOCAL COMMUNITIES

3.1 Equal opportunities, non-discrimination and fair working conditions

The Recipients must ensure that all persons have equal opportunities at work without direct or indirect discrimination based upon age, gender, ethnic and geographical origin, religious, political and trade union beliefs, social and cultural conditions, education, disability, family circumstances, sexual and emotional orientation and in general all intimate characteristics of human beings.

The Recipients must also guarantee that the workplace is a location where no harassment, threats or any other form of physical or sexual, psychological or verbal abuse or harassment is used.

The Recipients must not engage in any conduct that limits the individual personality in all phases that characterise the working relationship.

3.2 Forced labour

The Recipients must respect the principles, values and internationally accepted best practices regarding workers' rights, refraining from using any form of forced or compulsory labour.

The Recipients must guarantee and promote respect for free labour, based on fair and transparent contracts for workers, and avoid unjustified restrictions on free movement and misappropriation of documents and wages, in order to combat modern forms of slavery.

3.3 Child labour

The Recipients must respect the minimum age of employment and completion of compulsory education established by applicable laws and regulations.

3.4 Freedom of association for workers

The Recipients must comply with all applicable laws and regulations aimed at ensuring the freedom of association of workers and recognising the right to collective bargaining.

Employees must not fear intimidation or reprisals for forming or joining a trade union or participating in collective bargaining.

3.5 Health and safety of workers

The Recipients must comply with all applicable laws and regulations, by way of example but without limitation, rules on the health and safety of workers, occupational hygiene and prevention of workplace accidents.

The Recipients must also comply with the ERG Group's rules on health and safety cited in the contracts and related annexes.

The Recipients must take steps to create a working environment that is attentive to health and safety issues, possibly supported by the adoption of management systems certified in accordance with recognised standards, aimed at minimising risks and eliminating causes that may endanger the health and safety of personnel and third parties.

The Recipients must also inform the ERG Group promptly in the event of accidents to their personnel, their subcontractors' personnel or third parties during or as a result of the execution of the activities.



3.6 Respect of workers' contractual terms

The Recipients must ensure that the daily and weekly working hours do not exceed the maximum limit established by the applicable laws and regulations. The Recipients must remunerate overtime hours in compliance with legal and contractually established provisions.

The minimum wages of employees may not be lower than those established by the collective bargaining agreements and by the legislative and regulatory rules in force in the various countries.

Employees must also be guaranteed periods of rest, leave of absence and holidays established by the contracts and collective labour agreements and in compliance with applicable law and regulatory provisions.

3.7 Recipients' supply chain

The Recipients undertake to pay particular attention to the procurement of goods, performances and services relating to their assignment when they come from countries and contexts where behaviours contrary to those promoted by this Code may occur, such as failure to respect human rights, corruption, violation of applicable laws on responsible sourcing of mineral resources and other improper ways of operating. The Recipients also undertake to guarantee the traceability of the raw materials used, informing the ERG Group, upon request, of the origin of those that are critical, with particular attention to those deriving from mining/quarrying activities³. The Recipients undertake to adopt criteria for the selection of their suppliers and monitoring mechanisms consistent with the principles of this Code aimed also at ensuring an adequate assessment of the risks in order to avoid interruptions in the supply chain (e.g. logistical, climatic, geopolitical, counterparty reliability risks).

3.8 Community involvement

The ERG Group is committed to the social and economic development of the local communities in which it operates and requires the Recipients to carry out their activities while participating in the growth and development of the local area, establishing relationships of dialogue and constructive collaboration with all its stakeholders, based on the utmost transparency and trust.

4. RESPECT OF THE ENVIRONMENT

4.1 Compliance with environmental regulations and environmental management systems

The ERG Group considers the protection of the environment and biodiversity to be of fundamental value in its way of doing business and also relies upon the active contribution of the Recipients so that it can continue to be a socially responsible business entity. Therefore, compliance with applicable environmental laws and regulations is required, as well as the adoption of an approach that pursues the preservation and efficient use of natural resources with a view to reducing the environmental impact.

The Recipients must also comply with the ERG rules on the environmental aspects cited in the contracts and related annexes.

In particular, as part of what is defined in the Code of Ethics, HSE Policy and Sustainability Policy, the Recipients must commit to reducing greenhouse gas emissions and energy consumption by favouring the use of renewable sources, protecting local ecosystems and biodiversity, also through actions aimed at reducing negative impacts (deforestation), promoting the informed and responsible use of all available natural resources, including efficient and sustainable water management, and identifying, managing and minimising waste and other materials (e.g. hazardous substances and plastic) and preferring recycling and recovery activities. This commitment is also supported by the adoption of management systems certified according to recognised standards.

The Recipients must also deal with any environmental emergencies by employing management and intervention procedures, based on careful risk analyses and assessments, as well as inform the ERG Group promptly in the event of environmental accidents.

³Critical materials include silicon, copper, lithium, cobalt, necessary for the production of technological components such as solar panels, batteries and inverters.



5. MONITORING AND COMPLIANCE

5.1 Methods of conducting audit and control activities

The Recipients must provide the Group with all information necessary for the correct and complete initial assessment; such assessment is ongoing for the entire duration of the business relationship.

Based on the assessment of the risk associated with each Recipient, the ERG Group reserves the right to conduct inspections and audits, directly or through formally appointed third parties, in order to verify compliance with this Code and, where appropriate, to propose improvement plans.

5.2 Reporting mechanisms

Without prejudice to the reporting obligations on the part of the Recipients pursuant to the Code, the ERG Group ensures that violations of the Code of Ethics can be reported, particularly any offence that constitutes - or may constitute - a violation of this Code. In particular, if anyone has a reasonable suspicion that a violation has occurred or may occur, they may report it via the ERG Group's Whistleblowing platform, which can be accessed at <https://erg.integrityline.com/frontpage> using any browser, including mobile devices. Whistleblowing management (including the protections afforded to the whistleblower) is governed by the Whistleblowing Guidelines adopted by the ERG Group.

5.3 Management and assessment of cases of non-compliance

In the event of non-compliance with the provisions of this Code, the Group reserves the right to ask the Recipients to implement corrective measures in the timescales agreed with the Group.

In particular, the ERG Group is willing to liaise with the Recipients in their process of identifying and adopting improvement actions with the aim of remedying the non-compliance found.

If the identified measures are not implemented, as well as in the event of a serious or systematic breach of this Code, the ERG Group reserves the right to terminate any existing contract early and to exclude the supplier from the Vendor List.

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