

# Supplier Code of Conduct

TREVI - Finanziaria Industriale S.p.A.

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## SUPPLIER CODE OF CONDUCT

*A supplier code of conduct is established by the Supply Chain in order to ensure that a company's suppliers meet high standards of safe working conditions, fair and respectful treatment of employees and ethical practices.*

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## I. INTRODUCTION

The Trevi Group is a worldwide leader in the field of underground engineering for special foundations, tunnel excavations and soil consolidation as well as in the design and marketing of industry-related specialised technologies.

Internationalisation, integration and the continuous interchange between its two divisions are among the reasons for its success, specifically: Trevi, which carries out special foundations and soil consolidation works for large infrastructure projects (*subways, dams, ports and docks, bridges, railway and highway lines, industrial and civil buildings*), secures polluted sites in addition to build and manage underground and automated car parks and Soilmec, which designs, manufactures and markets machinery, systems and services for underground engineering.

## II. SCOPE OF APPLICATION AND RECIPIENTS

The Suppliers of goods and services who cooperate with the Trevi Group are expected to comply with this Code, of which the Trevi Group Code of Ethics and the Model pursuant to Legislative Decree 231/01 (which can be consulted on the Company's website) are an integral part. Therefore, the Group promotes its dissemination and application within the scope of its commercial relationships. Observance of the rules of this Code, or the existence of a Code of Ethics and a Model pursuant to Italian Legislative Decree 231/01 of the same Supplier providing for similar obligations, shall be an essential part of the obligations assumed by recipients on whatever basis and for all legal purposes towards the Trevi Group. Suppliers are, in turn, required to inform, share and describe the principles laid out in the Supplier Code of Conduct to their employees, sub-suppliers, collaborators and the employees of the latter, guaranteeing and verifying compliance with it.

### **III. GOVERNANCE AND FIGHT AGAINST CORRUPTION**

#### **3.1 Antitrust, anti-corruption and anti-money laundering**

Suppliers are required to respect applicable antitrust laws and regulations and pursue the principles of fair and transparent competition; they are also required not to use, for the purposes of winning a supply, unfair tactics, such as the abuse of their 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.

Suppliers are also prohibited from enacting any practice that may be restrictive or capable of unlawfully disrupting the market when performing their activities.

Suppliers shall adopt a fair and impartial policy when choosing their own suppliers.

Suppliers and their sub-contractors shall operate in full compliance with laws and shall not practice or tolerate any kind of corruption, active or passive, explicit or implicit.

Suppliers are also required to respect laws on anti-money laundering, self-laundering and handling of stolen money, goods or other benefits.

#### **3.2 Conflict of interest**

Suppliers shall avoid any situation that may lead to conflict of interest or interfere with the capacity to make impartial decisions.

Suppliers are required to conduct themselves in a manner compliant with the principles of business ethics and transparency. They are called upon to avoid any and all conflicts of interest capable of influencing the commercial relationship with the Trevi Group or which could interfere with their capacity to perform their activities impartially and for the benefit of the Group, or of other third parties.

Suppliers shall report any situation that may result in a conflict of interest to the Trevi Group, before establishing any business relationship.

### **3.3 Privacy and intellectual property**

Suppliers shall process, collect, store and manage personal data in compliance with applicable privacy regulations and retain them carefully and for a period appropriate to the expressed requirement, protecting their access by unauthorised entities and guaranteeing their integrity and confidentiality through the most suitable technical and organisational tools.

Suppliers shall respect and protect the confidential information, know-how and intellectual property of the Group and of third parties. They shall be deemed liable for the use or violation of patents and/or trademarks and/or other intellectual property rights relating to the utilisation of materials, machinery or work methods used in the performance of their activities.

The confidentiality obligation shall remain in force even after the termination of the relationship with the Trevi Group.

## **IV. PROTECTION OF HUMAN RIGHTS**

### **4.1 Child and forced labour**

Child and forced/mandatory labour are not allowed.

In this regard, a remedial procedure has been established as a form of protection for the possible management and termination of child and youth labour (see PR-IMS-04-T01\_Remedies for Child Labour)

### **4.2 Occupational health and safety**

Suppliers are required to respect all applicable laws and regulations relating to worker health and safety, providing healthy environments and ensuring effective measures to prevent accidents, injuries or occupational diseases.

They are also required to eliminate or reduce the causes of all hazards in the workplace, including through appropriate awareness-raising, information, training and education programmes for workers, encouraging the adoption of responsible and safe behaviours.

#### **4.3 Discrimination, diversity and inclusion, gender equality**

Suppliers are required to ensure that all persons are treated in a manner that promotes the dignity, freedom and equality of all workers, without any discrimination based on colour, gender, language, religion, ethnic origin, physical or psychological disability, civil status, sexual orientation or political or union opinions and to guarantee protection from all forms of discrimination and physical or mental coercion, mobbing, intimidation, verbal insults or any other offences against the dignity of the person.

Suppliers shall also foster a work environment that accepts diversity and welcomes it as added value.

Suppliers are required not to conduct themselves in any manner that limits personal rights and freedoms in any phase of the working relationship and to ensure that hiring, salaries and promotions are fair and equitable by promoting gender equality between men and women.

#### **4.4 Working time and remuneration**

Our suppliers shall ensure that working hours comply with the law and that rest days and holidays are respected for their staff. Salaries shall be decent and correspond at least to minimum industry standards, while overtime work shall be voluntary and paid at a premium rate according to national law.

## **V. SOCIAL ASPECTS**

The Trevi Group strongly believes that “the first step towards the evolution of ethics is solidarity with fellow human beings”.

The Company requests its Suppliers to:

- respect local cultures and traditions, as well as the regulations applicable in the countries in which they operate, reducing to a minimum the inconveniences caused to local communities;
- support the local economy by employing local personnel and suppliers;
- promote and support social and cultural solidarity initiatives at the local level through real participation and organisational and economic support for people, bodies and organisations aiming at the full affirmation of human dignity.

## **VI. ENVIRONMENTAL ASPECTS**

Suppliers are required to abide by applicable environmental laws, respecting the local environment and favouring the responsible use of recycled products or those less harmful to the environment.

Specifically, it is of utmost importance to reduce to a minimum the environmental impacts resulting from their activities, preserving local ecosystems and biodiversity, limiting, where possible, the production of waste, emissions and effluents and promoting renewable sources.

## **VII. MONITORING**

### **7.1 Methods for carrying out audits and control activities**

Upon request of the Trevi Group, Suppliers shall provide all the information necessary for a proper and comprehensive assessment.

If the Supplier is unable to satisfy the principles of this Code, in part or in whole, the Group shall be promptly informed in this regard.

The Trevi Group reserves the right to perform investigations and inspections, either directly or through formally engaged third parties, in order to verify compliance with this Code.

### **7.2 Management and assessment of cases of non-compliance**

If cases of non-compliance with the provisions of this Code are identified in the Qualification phase and/or on the occasion of subsequent checks, the Trevi Group reserves the right to require Suppliers to implement corrective measures.

Should corrective measures not be implemented, or in the case of a serious or systematic breach of this Code or of the same principles set out in the Code of Ethics of the Supplier, the Trevi Group reserves the right to early terminate the working relationship with the said Supplier.

Without prejudice to the foregoing, any further consequences specifically stipulated and established in the existing contract with the Supplier shall remain unaffected.

## VIII. REPORTING

Constant and transparent dialogue lays the basis of the relationships between the Trevi Group and its Suppliers. Any violations of the contents of this document - even suspected - shall be properly communicated to the relevant Function:

- by way of the dedicated software available on the website <https://gruppotrevi.segnalazioni.net/en>

or

- by writing to [TREVI - Finanziaria Industriale S.p.A. Via Larga di Sant'Andrea, 201 - 47522 Cesena \(FC\) - Italy](#), to the attention of "*Ufficio Segnalazioni Whistleblowing/Internal Audit*"

or

- by submitting a report through the dedicated box located at the reception desk of the "Y" Building and Trevi S.p.A. jobsites.

The Company handles the reports received as strictly confidential in accordance with the provisions of corporate procedures and regulations of reference, also guaranteeing whistleblowers - among other things - protection against any form of retaliation, discrimination or penalisation.

### 8.1 Document development

The Supplier Code of Conduct is not a static document.

In order to remain an important reference point and guarantee the adequacy and effectiveness of its contents and application, the document is periodically reviewed based on regulatory and legislative developments, best practices, and input from stakeholders.

