

Suppliers Code of Conduct

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1. Introduction

Legance - Avvocati Associati ("**Legance**" or the "**Firm**") is a professional association that operates in compliance with the law, the legal profession, the Code of Ethics of the Bar, the Charter of Fundamental Principles of the European Lawyer, the Code of Ethics of European Lawyers, its own articles of association and code of ethics ("**Code of Ethics**").

Legance considers environmental, social and governance issues ("**ESG**") to be an integral part of the Firm's professional mission and, through its activities, aims to generate environmental, social as well as economic values.

Legance therefore operates in accordance with the highest standards of sustainability to reduce its impact on the environment and the community and to create shared value. For this reason, the Firm has adopted a specific sustainability policy ("**Sustainability Policy**") which, by supplementing what has already been defined by the Code of Ethics, identifies principles and commitments which should guide the activities of the Firm and of all its professionals and employees.

2. Purpose and recipients

In order to underline its commitment to the promotion of ESG principles and best practices, Legance has drawn up this code of conduct ("**Code of Conduct**") in the belief that the pursuit of the Firm's sustainability principles and ethical values ("**ESG Principles**") requires them to also be complied with by those who are part of the value chain and, more specifically, all third parties that provide services, goods or premises to Legance (including, therefore landlords, who provide the right to use the premises; IT service providers; recruitment-head hunters) ("**Suppliers**"). In this respect, the providers of professional services appointed by a Professional of the Firm to carry out the professional mandate entrusted to a Professional (e.g. co-counsel, co-advisers, domiciliaries, experts, etc.) are not Suppliers of Legance.

The Code of Conduct therefore endorses the Firm's further commitment to spreading and promoting the ESG Principles by only selecting Suppliers that share its approach to sustainability in terms of attitude and business operations. The signing of the Code of Conduct is therefore a prerequisite for registration in the Supplier Register and with it the Supplier undertakes to ensure compliance with the ESG Principles in all its activities and business relations.

3. ESG Principles

3.1 The Environment

- > The environment, biodiversity and ecosystems are vital and fundamental assets that the Supplier intends to safeguard and protect, also in the interest of future generations.

3.2 Work and Human Rights

- > The Supplier recognises the correct implementation of current legislation and compliance with related regulations, together with information and training activities, as essential tools for achieving, maintaining and improving the conditions and environment where work is carried out, which are necessary for the protection

of health and safety.

- > The Supplier guarantees a suitable working environment that safeguards health and safety, with the aim of providing adequate environmental conditions to carry out business activities.
- > The Supplier supports the employees' freedom to join unions and recognises the right to collective bargaining contracts.
- > The Supplier takes into consideration merit criteria, competence, honesty and correct behaviour as key factors when making decisions concerning internal growth. In particular, all decisions and choices concerning employees and contractors must be based on their proven ability to perform their assigned tasks and professional qualifications. No employee or contractor should be given advantages or suffer disadvantages due to factors unrelated to his or her professional and human capabilities and qualities.
- > The Supplier firmly believes that the respect of human rights and workers rights are fundamental and indispensable values and is committed to combating all forms of human rights abuses and violations.

3.3 Diversity equity and inclusion

- > The Supplier shall refrain from any kind of discrimination based on age, gender, sexuality, physical health and fitness, race, nationality, religious or political beliefs. The Supplier shall likewise refrain from any kind of discrimination when carrying out its activities including in its business relations.

3.4 Integrity, ethics and anti-corruption

- > The Supplier carries out its tasks in compliance with the EU, national and international regulations in force in the territory in which it operates, rejecting corruption and all illegal practices.
- > The Supplier shall not tolerate any requests, pressure or threats aimed at obtaining treatment that is contrary to laws, regulations and all other mandatory provisions in force or to the moral, religious and political views of individuals.
- > The Supplier ensures the privacy, collection, proper handling and protection of personal data, as stipulated by relevant legislation and regulations.
- > The Supplier avoids any situation that may give rise to conflicts of interest.

4. **Supervision of the enforcement of the Code of Conduct**

Legance verifies, on an annual basis, that Suppliers have an adequate level of awareness and oversight of the ESG Principles through the completion of a specific self-assessment questionnaire¹ ("**ESG Questionnaire**") detailed in Annex 1 and/or specific subsequent due diligence. In addition, achieving a minimum score in the ESG Questionnaire is a prerequisite for inclusion in the Supplier Register.

¹ For the preparation of the ESG Questionnaire, the international standard ISO 20400 was used as a reference standard. "Sustainable procurement".

5. Final principles

This Code of Conduct represents the formalisation of principles contained in the Code of Ethics² and methods of conduct that already characterise the relationship between Legance and Suppliers.

The Code of Conduct is adopted by resolution of the Firm's Management Committee, which is also responsible for making any amendments, additions and/or updates to it upon the request by any member of the Firm's Management Committee.

* * *

The Code of Conduct is an official document of the Firm. The internal compliance rules are available on Legance's intranet site and are to be considered as a "*unicum*", meaning that all principles of conduct and control are to be applied cumulatively, where appropriate, to every activity carried out by the Firm.

² *"In relations involving the supply of goods and provision of services, Legance operates in compliance with the regulations and principles of this Code of Ethics, as well as with internal compliance rules. Business relations with suppliers are based on the principles of fairness, professionalism, efficiency, reliability and sustainability."*

ANNEX 1 – ESG QUESTIONNAIRE

- 1. Do your organisation's policies and strategies take into account the material sustainability impacts of your supply chains?**

5 Points = Yes, they cover the environmental, social and economic aspects of procurement and focus on all material impacts in supply chains.

4 Points = Yes, they cover the environmental, social and economic aspects of procurement and focus on all material impacts in supply chains but without a formalised procedure.

3 Points = Several material impacts on the sustainability of our supply chains are taken into consideration.

2 Points = We are beginning to take into consideration the material impacts on the sustainability of our supply chains.

1 Point = No, the policies and strategies of our organisation do not exist or are very vague.
- 2. Are there clear policies regarding sustainable supply within your organisation?**

5 Points = Yes, the policies are clearly defined in all company roles.

4 Points = Yes, the policies are clearly defined in many company roles.

3 Points = To some extent, the policies are defined but not yet structured.

2 Points = To a certain extent, policies are being developed.

1 Point = No, not yet.
- 3. Is sustainable procurement integrated into your (governance) procurement procedure?**

5 Points = Yes, the procurement procedure in place covers sustainable procurement for the entire scope of purchasing activities, including clear rules and guidelines in procedures and systems.

4 Points = Yes, the procurement procedure in place covers sustainable procurement but not for the entire scope of the purchasing activity.

3 Points = To some extent, but the procurement procedure lacks clear rules and indications in the procedures and systems.

2 Points = No, our procurement procedure does not cover sustainable procurement, but we are making arrangements.

1 Point = No, our procurement procedure does not cover sustainable procurement.
- 4. Do the functions, objectives and personal development and growth plans of persons responsible for the sourcing of goods and services include sustainable procurement?**

5 Points = Yes, sustainable sourcing elements are clearly defined.

4 Points = Yes, sustainable sourcing elements are largely defined.

3 Points = To some extent, sustainable sourcing elements are defined but only concerning the purchasing side.

2 Points = No, sustainable sourcing elements are not defined but are being developed.
1 Point = No, sustainable sourcing elements are not defined.

5. In order to achieve your sustainability goals, do you engage in supplier development, management and relationship-based initiatives in order to develop supplier capabilities and diversity in the industry?

5 Points = Yes, we have initiatives in place with all key suppliers.

4 Points = Yes, we have initiatives in place with some suppliers.

3 Points = To some extent, we have some initiatives in place.

2 Points = No, we have some initiatives under development.

1 Point = No, we are assessing initiatives.

6. Have you defined performance indicators internally to routinely collect data on the performance of your internal functions and supply chains?

5 Points = Yes, indicators are completely defined and incorporated into the objectives for all key categories and suppliers.

4 Points = Yes, indicators are defined but not completely incorporated into the objectives.

3 Points = To some extent, indicators have been defined but are not incorporated into the objectives.

2 Points = No, the indicators have not been defined but will be defined shortly.

1 Point = No, we have not yet defined the indicators.

7. What percentage of your expenditure categories - products, services and goods - with significant sustainability risks are defined in your strategic sustainability management throughout the sourcing and contract management process?

5 Points = Very high.

4 Points = High.

3 Points = Average.

2 Points = Sufficient.

1 Point = Low.

8. Has the organisation implemented any of the measures listed below to strengthen the traceability of its supply chain?

5 Points = The company implemented a traceability system using the company's existing resource planning, ERP systems, financial documentation (sales, payroll), chain of custody documentation, health and safety documentation and/or time sheets.

4 Points = The company uses risk assessment information to identify and prioritise the most important sustainability metrics, and then uses them to increase the sustainability of the supply chain.

3 Points = The company mapped its internal supply chain processes to assess risks inherent in procurement and sourcing.

2 Points = The company is beginning to track its internal supply chain processes to assess risks inherent in procurement and sourcing.

1 Point = None of the above.

9. Does the organisation do the following to ensure compliance of its suppliers with regard to governance, ethics and anti-corruption?

5 Points = The company conducts an independent third-party audit/assessment of its suppliers at least once every two years.

4 Points = The company conducts regular audits or reviews of suppliers with regard to governance, ethics and anti-corruption at least every two years.

3 Points = The company shares policies or rules with suppliers concerning governance, ethics and anti-corruption, but has no verification process in place.

2 Points = The company asks suppliers to complete an internally developed assessment regarding governance, ethics and anti-corruption issues.

1 Point = None of the above.

10. During the supplier approval process, are the code of ethics, compliance with regulations protecting human rights and decent working conditions and compliance with environmental regulations taken into account?

5 Points = Yes, absolutely, we verify compliance with all the above regulations through the collection of relevant documentation (*Durc, Durf, Duvri*, etc.).

4 Points = In part, we verify through self-declaration only.

3 Points = Not yet, but we have defined the guidelines to be implemented.

2 Points = Not yet, but we are evaluating how this can be done.

1 Point = No.