

## PREMISE

**ISAGRO**, aware of its role as a market leader and innovator at a global level, has chosen to promote the dissemination of the culture of Sustainability.

This Sustainable Procurement Guideline (hereinafter also referred to as the "Guideline") aims to promote sustainable and responsible procurement practices throughout the entire supply chain.

In this sense, **ISAGRO**, which has always been committed to adopting the principles and standards detailed in this document, also requires its Suppliers/Subcontractors to recognize and adopt them and to ensure compliance with them.

Compliance with and signing of this Guideline is a necessary condition for establishing and maintaining a business relationship with **ISAGRO**. Any violation of this Guideline will entitle **ISAGRO** to terminate the business relationship.

## SCOPE OF APPLICATION

This Guideline is adopted for all purchases related to ISAGRO production plants and Research Centers.

This is without prejudice to the possibility of identifying, on the basis of risk-based assessments and within the limits of compatibility with specific sector regulations, to which other companies to extend this Guideline in the GOWAN Group.

## REFERENCE DOCUMENTS

The Sustainable Procurement Policy must be read in conjunction with the following documents that prescribe the principles and values and are inspired by :

- Code of Ethics;
- Organization, Management and Control Model pursuant to Legislative Decree 231/2001;
- Quality Policy;
- Health, Safety and Environment Policies of production sites and Research Centre

Suppliers/Subcontractors are required to comply with the regulations and standards in force in the countries in which they operate, if local regulations are less stringent than the principles contained in this Guideline, they undertake to adopt, within a reasonable period of time, the necessary measures to comply with the principles and behaviors defined in this Guideline and detailed below.

This Guideline applies to all Suppliers in all countries in which **ISAGRO** operates.

## COMMITMENT

**ISAGRO** has among its primary values that of Business and Social Ethics and Sustainable Development (through tools such as Supplier Contracts – Sustainable Purchasing Policy, the Code of Ethics), through which it conveys a message of loyalty, fairness and respect and which represents a point of reference in the social reality in which it operates.

In this context, **ISAGRO** considers it of particular importance to create transparent and lasting relationships with the actors in its supply chain and to share the values and principles by which **ISAGRO** is inspired in carrying out its activities.

To this end, **ISAGRO** has decided to adopt a Sustainable Procurement Policy, which defines the principles and rules of conduct that it requires compliance with along its supply chain.

The provisions of the Sustainable Procurement Policy are inspired by the principles set out in the fundamental conventions of the ILO (International Labour Organization) and in the Universal Declaration of Human Rights of the United Nations. Top Management remains responsible for evaluating the periodic updating of this Guideline.

The Top Management:

- defines the commitments made in this Guideline based on the risks identified;
- identifies the indicators to be adopted;
- receives periodic monitoring of indicators;
- adopts actions to support the implementation of the Policy and intervenes in the event of explicit violation of the same.

Our mission is therefore to operate in a framework of fair competition, with honesty, integrity, fairness and good faith, respecting the legitimate interests of the property, employees, customers, partners, and the local community with whom we enter into relationships.

In particular, **ISAGRO** actively promotes Corporate Social Responsibility and a sustainable supply chain, integrating attention to social, environmental, and governance issues within its strategic vision.

We believe that close collaboration with our supply chain is essential to achieve high levels of quality in our products, services and production activities.

The establishment of collaborations, the dissemination of this Supplier Code of Conduct – Sustainable Purchasing Guideline, the Code of Ethics are the ways in which **ISAGRO** involves and interacts with its suppliers. Suppliers/subcontractors are strategic allies who support us in the implementation of the works covered by the contracts acquired, able to offer Customers/Clients the best in terms of quality, environment, sustainability, ethics, social responsibility, innovation and performance.

**ISAGRO** mandates supply chain management methods that ensure the integration of sustainability, ethical and social criteria in the selection and involvement of Suppliers/Subcontractors.

**ISAGRO** has defined a structured process for the management of its suppliers to whom it requires to share and implement the principles expressed in the Sustainable Purchasing Policy, compliance with which will constitute an increasingly important component in the evaluation and selection phase of Suppliers/Subcontractors.

The selection of Suppliers/Subcontractors and the determination of purchase conditions are based on an objective assessment of the quality of the price and the ability to provide and guarantee services of an adequate level and to propose innovative solutions.

## **CUSTOMER CENTRICITY**

Professionalism, competence, availability and ethical behavior are the guiding principles that **ISAGRO** implements in its relations with customers, with a view to collaboration and continuous support, in order to guarantee the satisfaction and trust of its business partners.

**ISAGRO** is committed to creating value for customers, understanding their needs and expectations, responding to their needs through concrete solutions and quality consultancy.

Customer satisfaction and centrality is fundamental for **ISAGRO**, which is committed to establishing lasting

relationships and collaborations of value for both, combining experience with the ability to anticipate market trends and change.

**ISAGRO** adopts a responsible approach to the management of the flow of data and information, which arrive constantly and continuously from customers. Customer privacy is ensured by adopting high standards of data protection and security.

Transparency and objectivity are the key principles of ISAGRO's commercial and communication policies, which provide for the dissemination of information through special tools and ad hoc channels.

### LA PARTNERSHIP

ISAGRO believes that the selection of Suppliers/subcontractors must be aimed at innovative and reliable partners, willing to build a common success together with us starting from a high degree of added value creation, commitment, flexibility is the fundamental requirement for a lasting relationship.

The aim is to establish a long-term partnership relationship characterised by transparency and cooperation.

Development, growth and efficiency begin precisely in the selection phase of the Supplier with whom to start the collaboration, which takes place according to a documented procedure that guarantees impartiality and equal opportunities to all those involved.

Through the use of specific purchasing methodologies calibrated to the different product categories, **ISAGRO** strives to obtain the best conditions in terms of performance, price, quality, ethics and sustainability throughout the entire life cycle of the product/service.

Suppliers/Subcontractors are encouraged to implement the necessary mechanisms to identify, determine and manage risks in all areas covered by this document and to comply with all applicable legislative requirements, and to continuously improve the suitability, adequacy and effectiveness of their Sustainability Policies through appropriate measures.

They are also invited to maintain appropriate documented information that demonstrates the sharing and implementation of the values expressed in this document. Subject to agreement with the Supplier, **ISAGRO** reserves the right to carry out audits relating to the implementation of the principles set out in the Supplier Code of Conduct, the Sustainable Purchasing Policy, and the Code of Ethics.

In addition, the Supplier/Subcontractor, as a specialist in activities/services, is increasingly involved in the initial phase of Order Management, in order to share technical and economic commitments with the Company.

Isagro prefers Suppliers/Subcontractors who implement sustainable development practices (*such as Ecovadis, UN Global Compact, etc.*); the specific selection procedure, internal to the IMS, includes the pre-qualification, qualification and monitoring of suppliers that take place by sending the "**ESG Prequalification Questionnaire for Suppliers/Subcontractors**"; in this way, the actions of the Stakeholders aimed at social commitment are also known through the possession of voluntary certifications, such as:

- **ISO 9001** – aims to ensure customer satisfaction through, for example, cost control, waste reduction, increased productivity and the effectiveness of internal processes, with the consequent reduction of inefficiencies;
- **ISO 14001** – its main objective is to ensure that all activities, production and non-production, carried out by the Organization are carried out in respect of the environment; in fact, it allows the Organization to pursue objectives and implement policies that take into account legal requirements and information regarding significant environmental aspects;

- **ISO 45001** – its main objective is to ensure that the work environments in which all company activities are carried out are safe and healthy, preventing work-related accidents and occupational diseases while also proactively improving its OSH performance;
- **ISO 39001** – international road safety management standard for reducing the risk of serious or fatal accidents in relation to road traffic, controlling and managing everything under its influence and control. The RTD system aims to prevent, control and monitor risks and to continuously improve road safety performance;
- **ISO 37001** – helps to prevent, detect and manage situations of corruption (active or passive) by the organisation, its staff and business partners, promoting a series of measures and controls and providing support guidance for their application;
- **ISO 30415** – Diversity and Inclusion – provides a method and guidance to highlight the commitment and responsibility of valuing D&I management policies; provides the tools to help the organization create and maintain an inclusive work environment for all employees, regardless of their differences, and supports in the identification of goals and opportunities, defining the relevant actions to achieve them and identifying and assessing risks to prevent or contain them;
- **UNI/PdR 125** – promotes the adoption of policies for gender equality and women's empowerment at the company level and therefore aims to improve the possibility for women to access the labour market, leadership and harmonisation of life times;
- **SA8000** – "Social Responsibility Management System" – aims to improve working conditions and protect and enhance a company's staff. It is based on three key points which are the improvement of staff, the fair treatment of employees and the inclusion of international conventions. It is a reference that, by its nature, involves the whole company and requires attention and participation from management, top management, employees, suppliers, subcontractors and customers;
- **ISO 20400** - the guideline that allows the company's Procurement Functions (Budget Managers, Purchasing Department) and Social Responsibility (CSR) to comply with the Principles of Sustainability, mitigating the risks associated with inappropriate choices (e.g. non-compliance, climate-changing production activities, etc.) while also obtaining reputational benefits.

In this way, **ISAGRO** chooses its suppliers/subcontractors, preferring those who pay particular attention:

- environmental issues and the impacts (waste management, etc.) that their products have on the environment throughout their life cycle;
- the social issues of equity, equal opportunities, inclusion, absence of exploitation, economic treatment and working hours of employees in accordance with the "National Collective Agreements" of the category;
- to the ethical issues related to the fight against corruption and respect for human rights.

## THE ECONOMIC REPORT

ISAGRO aims to avoid situations of mutual dependence; therefore, on the one hand, it takes care not to build monopoly conditions of supply within the same product/service segment, on the other hand, it tries to limit as much as possible the degree of dependence of Suppliers/Subcontractors on the purchase orders that come to them from **ISAGRO**.

## THE RULES OF THE RELATIONSHIP

General reference conditions have been implemented differentiated according to the different types of supply ("General Conditions of Product Purchase" and "General Conditions of Contracting/Subcontracting"), which, together with the contractual models deriving from them, constitute the basis for supply relationships with **ISAGRO**. In addition, Suppliers/Subcontractors who access our construction sites are required to provide extensive and stringent documentation relating to Contribution, Remuneration, Regulatory, Environmental, Occupational Health and Safety, Social Responsibility, Energy Management, Sustainable Development and Anti-Corruption aspects.

ISAGRO's **Suppliers/Subcontractors** are also required to:

- adopt conduct that complies with the principles of business ethics and transparency and are called upon to avoid any situation of conflict of interest that may affect the business relationship with **ISAGRO** or that may interfere with the ability to carry out their activities impartially and for the benefit of the Company, or other third parties;
- not request, be promised or accept gifts, invitations or other preferential treatment for themselves or third parties and must also comply with the laws on anti-money laundering, self-laundering and receiving money, goods or other benefits;
- comply with applicable antitrust laws and regulations and pursue the principles of fair and transparent competition;
- refrain from engaging in any restrictive practice or capable of unlawfully disturbing the market in the conduct of its activities.

## OBJECTIVES OF THE SUSTAINABLE PROCUREMENT POLICY

- Direct companies towards better purchasing choices throughout the production chain and implement responsible purchasing policies;
- Encourage all internal and external stakeholders in the organization to transparency;
- To support and promote ethical behaviour, respect for human rights, the rule of law and international standards of conduct;
- To guarantee full and fair opportunities, avoiding forcing and prejudice in all decision-making processes;
- Ensure full respect for the interests of all internal and external stakeholders within the Organization;
- Propose innovative solutions to address its sustainability objectives along the entire production chain;
- Strive for continuous improvement.

## LABOUR AND HUMAN RIGHTS

In line with international standards and with a view to social protection and sustainability, in order to prevent and/or prevent its activity from causing or contributing to human rights violations, **ISAGRO** also requires its Suppliers to:

- Do not resort to child labor. They must not, under any circumstances, employ staff under the age of 15, unless it is a professional traineeship, training or apprenticeship program authorized by the Government and of manifest benefit to the participant;
- Do not use any form of forced labor. They must not tolerate the use of any disciplinary practice involving the use of physical and psychological violence and must oppose all forms of human trafficking and modern slavery;
- Recognize, respect and fully guarantee the right to work and free association of its employees in all plants and apply forms of collective bargaining in cases where rules and/or social system provide for them. Suppliers must work constructively with their employees, or any organization that represents them, to promote their best interests. Suppliers must try to create opportunities to listen to their employees;
- Do not tolerate any form of harassment and/or discrimination based on gender, minority membership, political opinions and religious beliefs, age, ethnicity, marital status, family status, disability, and any other personal condition, and must recognize and promote the positive value of diversity;
- Comply with the applicable rules on the regulation of working hours;
- Promote the material well-being of its employees as much as possible. Remuneration and allowances must be paid in accordance with the applicable regulations
- Confirm the planning, if not present, of an incentive remuneration policy
- Adjust pay levels and hours worked, with a view to sustainability

## ETHICS

**ISAGRO** requires Suppliers to act with transparency and integrity.

Fair competition is a fundamental prerequisite in creating business success, for achieving positive financial performance and creating value for shareholders. Suppliers must comply with the competition, antitrust, and trade laws applicable in each country in which they operate.

Any form of agreement in violation of competition is strictly prohibited, as well as commercial practices in violation of antitrust rules.

Suppliers must report any material conflict of interest, actual or potential, in the performance of their activities. A conflict of interest exists when a personal interest or activity interferes or could interfere with the business relationship with **ISAGRO**.

Suppliers must confirm the existence of a whistleblowing policy, with the aim of implementing an organizational culture based on integrity and ethics.

An effective whistleblowing procedure builds trust if it educates employees and other third parties on company standards; provides clear guidance on the reporting process; explains how to report an irregularity; defines the types of reports that can be sent; outlines any legal protections or restrictions. To promote ethical behavior and encourage a corporate culture in which irregularities are reported securely and internally, in order to avoid reputational damage and financial losses. Any retaliation against whistleblowers is prohibited.



## QUALITY

**ISAGRO** promotes the continuous improvement of the performance of its suppliers and their involvement in product innovation processes, with a view to strategic partnership.

In order to ensure maximum product safety and quality, **ISAGRO** is committed to involving Suppliers from the early stages of project development, adopting a preventive and proactive approach, which allows any critical issues to be anticipated and resolved.

In particular, in order to pursue its Quality Policy, **ISAGRO** requires Suppliers to have a certified Quality Management System. **ISAGRO**'s goal is that all suppliers of direct materials, performances and/or services related to the product/service are at least certified according to the international standard ISO 9001.

## HEALTH AND SAFETY AT WORK

**ISAGRO** makes the protection of health and safety at work a key principle of its action and its way of doing business. Therefore, it asks the Supplier to establish and maintain Occupational Health and Safety Policies aimed at providing safe and healthy working conditions to its employees in compliance with applicable legal requirements. Especially:

- Suppliers are required to adopt the principles of the Management Systems which, inspired by the ISO 45001 standard (or equivalent), promote the continuous improvement of performance;
- Suppliers are committed to disseminating and consolidating a safety culture that promotes responsible behavior on the part of workers;
- If the Supplier has been assigned an outsourced production process, the Supplier undertakes to adopt the applicable legislation and to eliminate, where possible, the hazards to the health and safety of workers, as well as to assess the residual risks, implementing solutions aimed at reducing them to a minimum level;
- In particular, those Suppliers who carry out their activities at **ISAGRO** offices are required to **adopt ISAGRO's Health and Safety Standards**.

## ENVIRONMENTAL PROTECTION

**ISAGRO** fully adheres to the principles of sustainable development by committing itself to minimizing the waste of non-renewable resources and keeping the consumption of renewable ones within the limits of their replenishment. To pursue this goal, the contribution of the entire supply chain is a fundamental and essential element.

One of **ISAGRO**'s priorities is the reduction of CO2 emissions throughout the entire product life cycle. To reduce the impact of the Supply Chain on the carbon footprint, **ISAGRO** asks its Suppliers for availability and transparency regarding the communication of emissions deriving from business processes and upstream activities and the commitment to implement effective measures to reduce direct and indirect CO2 emissions.

In addition, to minimize the environmental impact of their production activities, Suppliers must:

- Develop and maintain an Environmental Management System compliant with ISO 14001 standards, preferably by obtaining third-party certification;

- Commit to optimizing the use of natural resources, reducing emissions harmful to the environment, those responsible for the "greenhouse effect";
- Design products and processes that minimize the impact on the environment in their life cycle, with particular regard to water resources - for which their consumption must be progressively reduced and any form of contamination avoided - and the use of energy, the production of which is responsible for climate-altering emissions;
- progressively reduce the use of energy from fossil sources by promoting on-site self-generation projects and the supply of energy from renewable sources;
- suggest to **ISAGRO** the adoption of alternative products and processes that improve the environmental impact in their life cycle, such as materials of secondary origin with a view to circular economy;
- appropriately manage the treatment and disposal of waste in accordance with current regulations, reducing as much as possible the production of waste destined for landfill disposal in favour of recoverable waste;
- avoid the use of hazardous substances where technically possible, and when their substitution is not feasible, manage them in accordance with the applicable rules, not only with regard to the place of production, but also with regard to the place of destination of the products.
- Suppliers must submit documentation for responsible chemical handling
- Adopt optimized logistics procedures and encourage the use of means of transport that minimize the impact on the environment;
- Stimulate its supply chain in minimizing environmental impacts in line with the commitment that **ISAGRO** has made as its own and that it asks of its suppliers
- Prefer recyclable packaging and FSC-certified paper, guaranteeing the origin of the product from a responsibly managed forest and supply chain;
- Prefer the purchase of steel materials from suppliers who produce by implementing measures for the health and safety of workers, energy efficiency and the reduction of environmental pollution;
- Reduce the impact of distribution, favoring the procurement of materials, products, services from local companies,
- Promoting the reuse and recycling of materials and products at the end of their life cycle and, where this is not possible, ensuring disposal in the most correct way;
- Commit to favoring the use of renewable sources, minimizing the environmental impact of its activities, protecting local ecosystems and biodiversity, promoting the conscious and responsible use of all available natural resources, adopting systems to ensure the handling, conservation, recycling, reuse or management of waste and the management of emissions into the atmosphere and wastewater take place in a safe and compliant manner with the current legislation, also supported by the adoption of Certified Management Systems according to recognized standards.



## USE OF CRITICAL MATERIALS FOR ENVIRONMENTAL AND SOCIAL IMPACT

**ISAGRO** is committed to purchasing raw materials and components from suppliers and business partners who are able to demonstrate respect for human rights in the conduct of activities along their supply chain.

**ISAGRO** also reserves the right to request from Suppliers the presence and origin of other critical materials for environmental and social impact, in accordance with the regulatory evolution on the subject and in fulfillment of Customer requests.

## INFORMATION SECURITY

**ISAGRO** considers information security an indispensable factor for the protection of its assets and that of its stakeholders, as well as a factor of strategic value that can be translated into competitive advantage.

**ISAGRO** operates in compliance and is constantly committed to increasing its level of maturity through the implementation of measures, both technical and organizational, necessary to best guarantee the integrity, confidentiality and availability, control, authenticity and privacy of its information assets and that of its Customers, Partners, Suppliers, and Employees.

Therefore, in order to ensure that Information is protected throughout the entire Supply Chain, **ISAGRO** asks its suppliers to

- To treat the information provided by **ISAGRO** in an appropriate manner and to implement administrative, physical and technical controls that are no less stringent than Industry standards;
- Also include the following controls:
  - Securing company structures, paper archives and IT equipment;
  - The protection of the transmission, storage and disposal of information;
  - The implementation of access and authentication controls;
  - The segregation of **ISAGRO's confidential information** from that of other Customers and Suppliers;
  - The provision of appropriate training on Information Security to its employees;
  - The control of the copying and printing of **ISAGRO** information.
- Implement and maintain additional Security controls, as agreed between **ISAGRO** and the Supplier;
- Notify **ISAGRO**, as soon as possible, of cases of Information Security breaches and do its best to resolve the same immediately and to prevent future security breaches.

Suppliers/Subcontractors are also requested, in compliance with applicable laws and regulations, not to disclose to third parties and in any way for reasons that are not strictly related to the execution of the contract, the technical information and all confidential and strategic information made available by **ISAGRO**.

The obligation of confidentiality continues even if there is termination of the employment/collaboration relationship. The information that the Recipients become aware of during their work activities must be handled with due confidentiality; they may not be used for unlawful purposes, either for personal interest or to bring advantages to society.

## EDUCATION

**ISAGRO** undertakes to train on the principles referred to in this document and encourages all Suppliers to disseminate these principles through adequate training activities for its employees and Suppliers.

The development and use of advanced communication tools make it possible on the one hand to speed up the exchange of information, and on the other to ensure the transparency of relationships.

## MONITORING AND CORRECTIVE ACTIONS

ISAGRO requests its Suppliers for information relating to the above-mentioned issues through specific questionnaires/surveys and reserves the right to carry out checks through audits conducted by **ISAGRO** personnel or by third parties expressly authorized by the latter.

In case of non-compliance:

- Require Suppliers to prepare, and subsequently implement, a Non-Conformities Recovery Plan;
- It will conduct documentary checks and/or through further audits to ascertain the effective implementation of the recovery plans referred to above, subject to appropriate prior communication.

In the event that the Supplier violates the principles of the Sustainable Purchasing Policy, does not actively contribute to providing the requested information, or, in the event of Non-Compliance and the appropriate improvement plans are not prepared and implemented, **ISAGRO** reserves the right to precautionarily suspend and/or terminate any commercial relationship with immediate effect, as well as to take action for compensation for any loss, damage, expense or other direct or indirect costs that may arise from any breach and/or conduct by the Supplier.

The central themes of our sustainable procurement policy are listed below.

**Focus on needs:** We carefully examine our supply/procurement/procurement needs, buying only what is needed and looking for more sustainable alternatives.

**Integration:** the sustainability of Supplies Comes Integrated in all the Practices to maximize sustainable outcomes.

**Analysis of all costs:** we consider the costs incurred during the life cycle, the value for money obtained and the costs and benefits for society, the environment and the economy deriving from procurement activities.

**Continuous improvement:** We work to continuously improve sustainability practices and outcomes, and encourage our suppliers to do the same

The achievement of the objectives set, through the Policy, will also be possible through the scrupulous and punctual application of the provisions of the Sustainable Procurement Management, which defines and describes the management system implemented by our company.

Each company buyer is a protagonist in achieving sustainable procurement, in all phases of the purchasing process of goods and services, through the effective and efficient application of the Sustainable Procurement Management System and the continuous improvement of operating methods, knowledge and experience.

The Management considers this Guideline to be a reference framework for the management of its Sustainable Procurement Management System and for the annual definition and review of its specific objectives.

The Policy is disseminated to all ISAGRO collaborators and made available to the remaining interested parties.

## **POLICY COMMUNICATION**

The Sustainable Procurement Policy is available as documented information on the ISAGRO institutional website ([www.isagro.com](http://www.isagro.com)) and is communicated within the organization and to all the Company's suppliers.

Within the organization, the dissemination of the Sustainable Procurement Policy is implemented by the Management through the actions of the company management and in particular those implemented by the Management Representative during:

- training interventions on business aspects and management processes of sustainable procurement;
- training interventions on sustainable procurement;
- Audits on the level of application of the Sustainable Procurement Policy.

## **POLICY REVIEW**

ISAGRO provides a framework for establishing, reviewing, and achieving sustainable procurement goals.

The Policy is revised as necessary during the Review by the Management or in relation to events and the following elements:

- Results of internal or external audits;
- Any changes dictated by changing circumstances;
- Any regulatory updates in the sector.

## **AUTHORITY**

The Management has appointed a Head of the Integrated Management System (RSGI) in order to pursue the objectives contained in the policy. The RSGI, by virtue of the mandate assigned with the appointment as far as it is concerned:

- Ensures supervision over the implementation of the IMS/procedures envisaged for purchases;
- Provides guidance and advice to staff on issues related to sustainable procurement;
- Ensures that the IMS/procedures provided for purchases comply with ISO 20400;
- Report on the performance of the IMS to the Board of Directors and Top Management as appropriate.

Milan, 20 July 2025

Marco Finco QHSE Manager (RSGI)