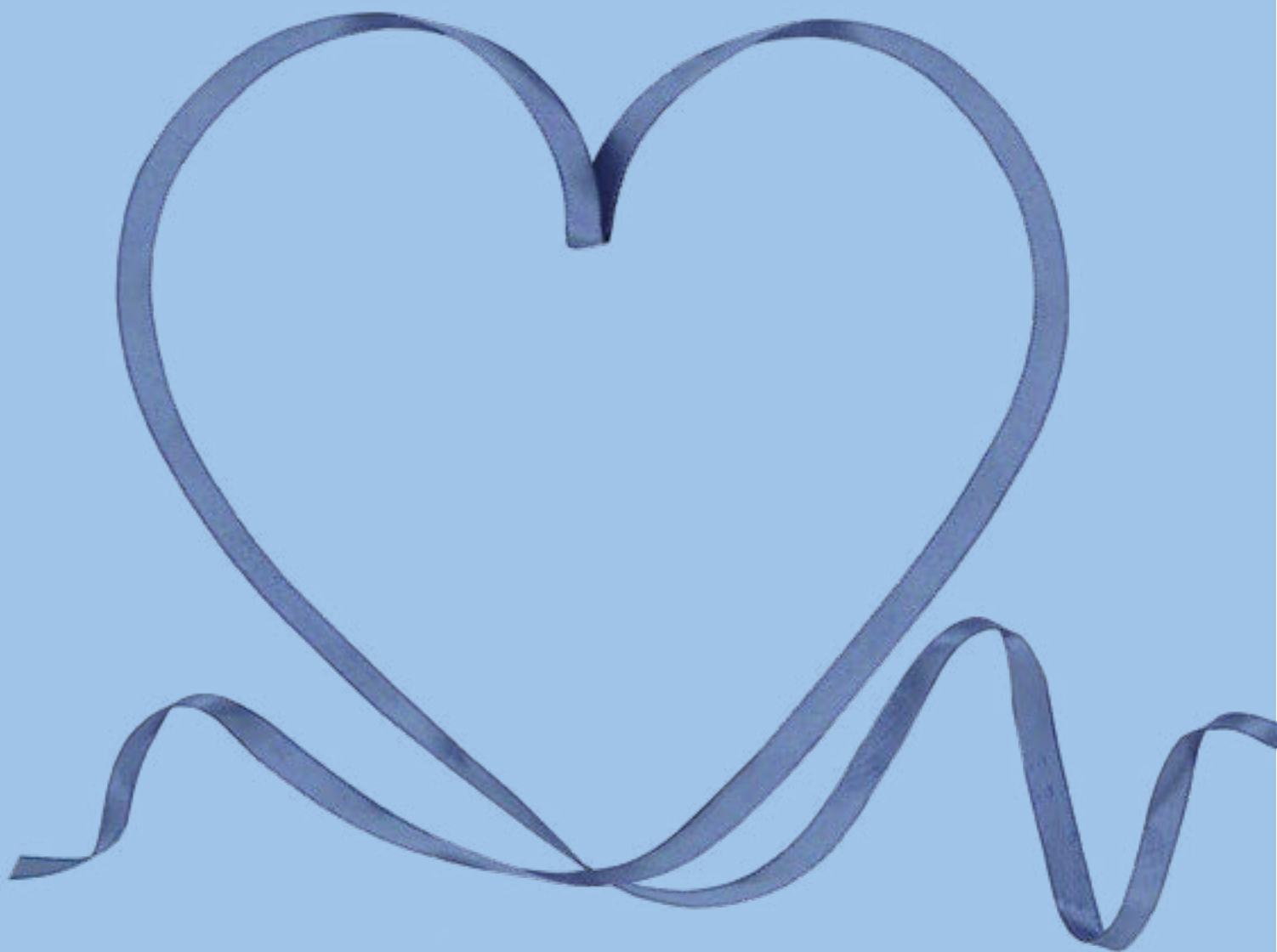


SUPPLIERS CODE OF CONDUCT



INTRODUCTION

Excellence for the Esselunga Group means guaranteeing its customers safe, quality products, but also committing to fostering a supply chain that is attentive to and respectful of applicable laws, workers, the environment and the ecosystem. The Esselunga Group is committed to establishing relationships of trust and building lasting and ethical partnerships with its suppliers, fostering a fair, sustainable and transparent supply chain.

This Suppliers Code of Conduct (hereinafter also the “Code”) is intended to ensure that Suppliers:

- provide their workers with fair and safe working conditions;
- operate in an environmentally friendly way;
- operate legally, with integrity, transparency and fairness;
- operate in accordance with applicable laws and regulations.

1. SCOPE OF APPLICATION

This Code applies to all suppliers of goods and/or services, including sub-suppliers, contractors, subcontractors and business partners, identified below as “Suppliers”, who have a commercial and/or contractual relationship with the Esselunga Group.

Suppliers are required to share the contents of this document with their collaborators, as well as to foster, within their own supply chain, ethical behaviours that ensure compliance with this Code, both by their internal organisational structures and by their sub-suppliers/subcontractors, encouraging compliance monitoring at all levels of the supply chain.

2. PRINCIPLES AND REFERENCE STANDARDS

The Code is inspired by the values and principles described in the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001, the Code of Ethics and Conduct, the Sustainability Policy, the Policy for the health and safety of workers, the environment and energy, the Quality Policy for food safety, of the Group or of the individual companies in the Esselunga Group, as well as the main standards issued by international reference organisations, including:

- the United Nations International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- the United Nations Convention on the Rights of the Child;
- the UN Convention on the Elimination of All Forms of Discrimination against Women;
- the UN Guiding Principles on Business and Human Rights;
- the “CEO Guide to Human Rights” of the World Business Council for Sustainable Development (WBCSD);
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) and its applicable conventions;
- the OECD Guidelines for Multinational Enterprises;
- the Sustainable Development Goals (SDGs) of the United Nations;
- the 10 principles of the Global Compact;

- the Women's Empowerment Principles (WEPs) for the promotion of gender equality;
- guidelines, including regulations and codes of conduct, issued by the European Union, including the Code of Conduct on Responsible Business and Marketing Practices in the Food Chain.

It should be noted that Esselunga, in carrying out its audits, will refer to the main international standards (e.g. ISO standards - International Organization for Standardization, CEPAA standards - Council of Economic Priorities Accreditation Agency, SASB standards - Sustainability Accounting Standards Board).

It is understood that Suppliers shall comply with all applicable national and international laws and regulations.

3. COMPLIANCE OF PRODUCTS AND SERVICES

The products and services offered by the Supplier must comply, in terms of quality and safety, with national and international laws and regulations and, where applicable, also meet the technical requirements and standards required by the Esselunga Group.

The Supplier undertakes to provide accurate and clear information on the methods and resources used, the production sites and the characteristics of the products or services provided, refraining from any misleading statements.

4. HUMAN RIGHTS AND SOCIAL PRACTICES

4.1 Labour relations

The Supplier undertakes to condemn any form of discrimination against workers on the grounds of social or ethnic origin, religion, gender, sexual orientation, age or any other circumstances that may give rise to discrimination or abuse, as well as any form of harassment or inappropriate or disrespectful behaviour in the workplace.

The Supplier undertakes to ensure that all workers are given equal opportunities and are treated with fairness, dignity and respect throughout all stages of the contractual relationship.

The Supplier shall only employ workers who meet the legal requirements for access to employment according to the regulations of the country in which the work is carried out. Where the Supplier employs a foreign national as a worker, it shall ensure compliance with all regulations, ensuring an inclusive and non-discriminatory selection, recruitment and remuneration process and freedom of movement.

The Supplier shall treat personal data and confidential information relating to its workers in accordance with the laws on data protection and confidentiality of information.

4.2 Wages and working hours

The Supplier shall comply with applicable laws, regulations and collective labour agreements concerning wages, benefits, working hours and social security contributions, ensuring that its workers receive decent, fair and regular wages. The obligations arising from the employment relationship must be formalised with the employee in the form of an employment contract that complies with the applicable legislation.

The Supplier shall recognise the right of its workers to freedom of association without prejudice or discrimination.

4.3 Occupational Health and Safety

The Supplier shall act in accordance with the applicable occupational health and safety regulations and shall endeavour to provide its workers with a healthy and safe working environment. The Supplier shall assess health and safety risks in the workplace with a view to preventing and managing them, identifying and using appropriate prevention and protection equipment.

The Supplier shall train and make workers aware of safe behaviour and compliance with occupational health and safety regulations.

Contractors must also report to the Esselunga Group and investigate all relevant occupational health and safety incidents occurring within the Esselunga Group's premises.

4.4 Forced and child labour

The Supplier shall not in any way use any form of forced or compulsory labour, performed under the obligation to repay a debt or slavery.

It is also expressly forbidden for the Supplier to seize or force workers to hand over their documents, sums of money or deposits in order to perform their work, or to implement practices that constitute an obstacle to the free termination of the employment relationship.

The Supplier shall act in full compliance with the regulations prescribed by the International Labour Organisation and shall not, in any way, employ, directly or indirectly, workers below the minimum age for admission to employment defined by the applicable law in the state where the work is carried out.

If local laws permit the employment of young workers, the Supplier shall protect them by avoiding dangerous and strenuous work situations that could endanger their health, safety or moral integrity.

4.5 Fighting and combating the gangmaster system

The Esselunga Group has always supported the fight against the gangmaster system. The Supplier shall not employ personnel who work against their will or who are not free to terminate the employment contract. It is absolutely forbidden to use undeclared work and any form of forced labour or labour exploitation that results in the humiliation of the dignity of the worker. In this regard, the Esselunga Group invites its suppliers, where applicable, to join the Quality Agricultural Work Network.

4.6 Training

The Esselunga Group expects the Supplier to ensure the development of the skills and expertise of all workers.

5. ENVIRONMENTAL PROTECTION

5.1 Compliance with environmental protection legislation

The Supplier shall adhere to and comply with all applicable environmental standards and requirements and shall undertake to implement initiatives aimed at improving its environmental performance.

5.2 Resource management and environmental impact

The Esselunga Group expects the Supplier to carry out its activities using all resources (including forests and soil) responsibly through the use of the best technologies that reduce the waste of natural resources and promote the repurposing, reuse and recycling of natural resources.

In addition, the Supplier shall provide means for the prevention and reduction of any accidental leaks and spills into the environment. Finally, the Esselunga Group expects the Supplier, where requested, to cooperate in calculating the environmental impact of the entire supply chain in order to assess the possibility of improving its environmental performance and minimising its negative effects.

5.3 Water resources management

The Esselunga Group expects the Supplier to minimise its impact on water resources by reducing consumption, maintaining/improving water tables and promoting water conservation.

5.4 Waste management

The Esselunga Group expects the Supplier to ensure responsible and sustainable waste management, reducing its ecological footprint and promoting a circular economy.

5.5 Managing emissions and optimising energy consumption

The Esselunga Group expects the Supplier to minimise its emissions, monitor and reduce energy consumption.

5.6 Protecting biodiversity

The Esselunga Group expects the Supplier to protect areas of high conservation value and promote biodiversity in relation to the products and services offered to the Esselunga Group.

5.7 Sustainable packaging

The Esselunga Group expects the Supplier to minimise the environmental impact of its packaging, for example, through eco-design activities and the choice of recycled, recyclable or compostable materials.

5.8 Use of chemicals and pesticides

The Supplier commits directly and throughout the supply chain to the responsible use of chemicals and fertilisers in line with industry standards and with respect for people, animals and the environment.

6. ETHICS AND BUSINESS PRACTICES

6.1 Fair competition

The Supplier undertakes to conduct its business in line with the principles of free competition and fairness and to refrain from any misleading or illegal market practices and any anti-competitive behaviour.

6.2 Corruption, extortion, embezzlement and money laundering

The Esselunga Group does not tolerate any form of fraud, corruption, extortion, embezzlement or money laundering.

The Supplier shall operate in full compliance with the law, with transparency, integrity and fairness.

The Supplier shall therefore refrain from offering, promising, paying, requesting, receiving, accepting directly or indirectly, money or other benefits in order to obtain an unlawful advantage.

The Supplier shall take all appropriate measures to prevent its business from being used for money laundering.

6.3 Conflict of interest

The Supplier undertakes to avoid any situation that could lead to a conflict of interest and, before entering into any commercial and/or contractual relationship and in the continuation thereof, to inform the Esselunga Group of the presence of a conflict of interest or any situation that could lead to a conflict of interest.

6.4 Privacy, confidentiality and secrecy of data and information

The Supplier shall treat personal data and information acquired in the course of the contractual relationship in accordance with the laws on data protection and confidentiality of information, as well as with the best practices applicable in the jurisdictions in which it operates.

The Supplier shall only use the personal data collected for purposes that are legitimate, defined and appropriate for the conduct of its business.

The Supplier guarantees that it is able to comply with all the conditions required by law when processing personal data as a Data Controller.

The Supplier, in relation to the privacy role covered, guarantees to be able to comply with the criteria of reliability and adequacy of the technical and organisational security measures adopted so that the processing of personal data, both its own and those of third parties, meets the requirements on the protection of personal data, the protection of the rights of the person concerned is guaranteed and a level of security appropriate to the risk is ensured and storage for a period congruent with the expressed need and the purpose pursued.

The Supplier warrants that it has properly trained the persons authorised to process data, and that it has, in accordance with applicable law, correctly identified the privacy roles in the performance of its activities and services.

The Supplier is required to ensure, in compliance with applicable legislation and where it processes personal data on behalf of the Esselunga Group, that it has a privacy organisation chart, a record of processing activities, a procedure for handling requests from data subjects and for managing personal data breaches. The Esselunga Group also expects the Supplier to put in place organisational and technological measures to ensure high standards of IT security to ensure the confidentiality of the information and data shared.

6.5 Responsible sourcing

The Esselunga Group encourages Suppliers to take commercial measures with regard to their suppliers, such as respecting payment terms and guaranteeing fair economic conditions.

The Esselunga Group expects the Supplier to assess and manage the impact on communities arising from its activities and to favour, as far as possible, sourcing from local suppliers, fostering inclusive development, providing appropriate economic conditions, with the aim of building positive and lasting partnerships with the communities in which it operates.

7. COMPLIANCE

7.1 Communication of breaches

The Supplier (including his collaborators) and the collaborators of the Esselunga Group are required to report any breaches of this Code.

The report must be received through a specific web-based platform called “Comunica Whistleblowing”, accessible at the web address https://digitalplatform.unionefiduciaria.it/whistleblowing/default_new4.asp?LANG=ENG, by using the code (“Token”) shown on the institutional website www.esselunga.it.

The Esselunga Group undertakes to analyse the report received, ensuring the confidentiality of the whistleblower’s identity, without prejudice to legal obligations. With the aim of protecting its suppliers, the Esselunga Group is committed to promoting direct and fair dialogue, creating a real sharing and listening forum to assess the reports received.

7.2 Audits

The Esselunga Group may verify compliance by its suppliers with the principles set out in the Code.

Specifically, in the case of suppliers of private-label products, audits may take place by requesting documentation and/or carrying out on-site audits and may be conducted directly by the Esselunga Group or by a third party appointed by it.

7.3 Resolution

If non-compliance emerges, including through the audit activities described in the previous paragraph, the Supplier may be asked to give notice of the corrective action planned within an agreed timeframe and the implementation of the above actions, which will be monitored by the Esselunga Group.

The Esselunga Group reserves the right to terminate any relationship and/or terminate any contractual agreement with a Supplier who refuses to implement the corrective measures.

Notwithstanding the above, in the event of a serious breach or default by the Supplier of the provisions listed in this Code, the Esselunga Group shall have the right to temporarily suspend the Supplier or, where it considers it appropriate, to terminate any contractual agreement with the defaulting Supplier.

8. UPDATES AND REVISIONS

This Code was formally approved by the Board of Directors of Esselunga S.p.A. on 23 March 2022 and is the first version of the document.

Esselunga undertakes to review and update this document periodically.

The current version of the Code is available, also in Italian, on the institutional website at www.esselunga.it.

**The Executive Chairman of
Esselunga S.p.A.**

Marina Caporali

