

CODE OF ETHICS

"WE TURN CHALLENGE INTO SOLUTIONS"

EXTRACT FOR SUPPLIERS AND PARTNERS

1 – RECIPIENTS

This Code is intended for all those persons who, directly or indirectly, permanently or temporarily, establish relationships or interact with SSE.

SSE requires that all Recipients, as is relevant to them, carefully read this Code and respect all its parts.

2 – THE CODE OF ETHICS

SSE has deemed it appropriate and necessary to adopt and issue a code that expresses the values to which all Recipients must conform, accepting the relevant responsibilities, structures, roles and rules, the violation of which, although it does not imply any corporate liability towards third parties, may result in personal responsibility either within or outside of the company. Knowledge of and compliance with the Code by all those persons who work for SSE are therefore essential for the transparency and reputation of the Company.

SSE is committed to dissemination of the Code among all those persons with whom it has business relationships, ensuring that they are familiar with and respect the rules contained therein.

3 – THE GUIDING PRINCIPLE

3.1 THE REFERENCE PRINCIPLES

Compliance with the laws and regulations in force in all the Countries in which the Company conducts its business, transparency and correctness in management, trust and cooperation with *stakeholders* are the ethical principles on which SSE bases its business - and which inspire its own models of conduct - in order to compete effectively and fairly in the market, to improve the satisfaction of its customers, to increase shareholder value, to develop the skills and professional development of its human capital and to contribute at the same time to the development and growth of the territory in which it operates. In particular, the conviction of acting in some way for the benefit of the company does not justify the adoption of conduct that is in conflict with these principles.

All Recipients, without distinction and exceptions, are therefore committed to observing and enforcing these principles within their own departments and area of responsibility. This commitment requires that even those individuals with whom the Company has relationships in any capacity respect the rules and methods inspired by the same values.

3.2 LEGALITY, HONESTY AND CORRECTNESS

SSE operates in compliance with the applicable laws, professional ethics and internal regulations. The pursuit of the interests of SSE can never justify conduct that is contrary to the principles of legality, fairness and honesty.

Relations with interlocutors are based on criteria and behaviours of fairness, collaboration, loyalty and mutual respect. SSE undertakes to adopt the appropriate and opportune measures so that the restriction of compliance with the legislation and with all the regulations in force, as well as with the pre-determined principles and procedures for this purpose, is adopted and practised by the Recipients of the Code.

3.3 CONFIDENTIALITY OF INFORMATION

SSE ensures the adoption of procedures aimed at guaranteeing the confidentiality of the information in its possession, compliance with the regulations regarding personal data and refrains from seeking out confidential data through illegal means. Recipients of the Code are forbidden from using confidential information for purposes not connected to the exercise of their professional activity.

3.4 RESPECT FOR THE PERSON

SSE ensures respect for the physical and cultural integrity of the person and respect for the concept of relationship with others, as well as ensuring that the working conditions internally are respectful of individual dignity and take place in safe working environments. SSE undertakes to document the applicable employment contracts with its personnel according to current legislation.

SSE does not tolerate requests or threats aimed at inducing persons to act against the Law or against the Code, or intended to adopt behaviours that are damaging to the convictions and moral and personal preferences of each person.

3.5 IMPARTIALITY AND EQUAL OPPORTUNITIES

SSE undertakes to avoid any discrimination based on age, sex, sexuality, health, race, nationality, political opinions and religious beliefs in all decisions that affect relations with its interlocutors.

3.6 CONFLICTS OF INTEREST

SSE works in order to avoid situations where the subjects involved in transactions are, or may appear, to be in conflict with their own interests, meaning that it is the case where the Recipients pursue interests other than the company mission or benefit personally from business opportunities, or it is the case in which the representatives of customers or suppliers act contrary to - in their dealings with the Company - the trust obligations linked to their position.

3.7 COMPETITION PROTECTION

SSE intends to protect the value of fair competition, refraining from conduct aimed at favouring the conclusion of business for its own benefit in violation of current laws or regulations and recognising that correct and loyal competition is a fundamental element for the development of the company and of the market.

3.8 PROTECTION OF THE ENVIRONMENT, SAFETY AND SUSTAINABLE DEVELOPMENT

As part of its activities, SSE undertakes to operate in compliance with the protection of the environment, according to the principles of sustainable development. It also undertakes to protect the health and safety of Recipients by adopting all the measures required by law.

3.9. REPUDIATION OF ALL FORMS OF TERRORISM AND CRIMINAL ORGANISATION

SSE repudiates all forms of terrorism and criminal organisation, national and transnational.

For this purpose, the Company does not establish any relationship of a working, collaborative or commercial nature with subjects, whether they are natural or legal persons, who are directly or indirectly involved in criminal organisations or who, in any case, are bound by kinship and/or affinity with exponents of known criminal organisations, as well as refraining from financing or, in any case, facilitating any activity related to these organisations.

4 – RULES OF CONDUCT: SUPPLIERS

Relations with suppliers are based on the search for the maximum competitive advantage, the granting of equal opportunities for the subjects involved, loyalty and impartiality.

4.1 CONTRACTUAL RELATIONS

SSE undertakes to ask its suppliers and its external collaborators to respect behavioural principles corresponding to its own, considering this aspect of fundamental importance for the establishment and

continuation of a business relationship. Every supplier, business partner or external collaborator must be informed of the existence of the Code and of the related commitments.

4.2 CHOICE OF SUPPLIER

The selection of suppliers and the determination of purchase conditions are based on an objective assessment of the quality, price and ability to provide and guarantee goods and services of an appropriate level.

As part of the selection process, carried out in a clear and non-discriminatory manner, SSE, basing on its supplier's qualification process, exclusively uses criteria linked to the objective competitiveness of the services and products offered and to their quality. For SSE, therefore, reference requirements are:

- The professionalism and experience of the interlocutor;
- The availability, appropriately documented, of means, including financial, organised structures, capacity and design resources, know-how, etc.
- The adoption of quality, safety and environmental systems.

4.3 SUPPLY OF GOODS AND SERVICES

In procurement relationships and, in general, the supply of goods and services, the Recipients are obliged:

- To adopt, in the selection of the supplier, the evaluation criteria provided by the existing procedures applied in an objective and transparent manner;
- To refrain from preventing anyone, in possession of the necessary requisites, from competing in the stipulation of contracts, adopting in the selection of the candidates objective and documentable criteria;
- To ensure that each selection process is sufficiently compatible with the object and nature of the contract;
- To observe the contractually agreed conditions;
- To inform suppliers of the behavioural principles established in this Code.

4.4 INTEGRITY IN RELATIONS WITH SUPPLIERS

The signing of a contract with a supplier and the management of the relationship with the supplier must always be based on extremely clear relationships. To guarantee maximum transparency and efficiency of the purchasing process, SSE undertakes to ensure:

- Adequate traceability of the choices made;
- The storage of information, as well as official selection and contractual documents for the periods established in the context of internal procedures and by current regulations.

5 – BEHAVIOURAL RULES: HUMAN RESOURCES

5.1 GIFTS OR PAYMENTS - PROHIBITION

It is forbidden for all personnel of SSE to accept gifts, which are not of a modest value or payments, offered to them by third parties relating to the work activities that such personnel perform within the scope of their business activities.

5.2 CONFLICTS OF INTEREST

SSE personnel are required to avoid all situations and activities in which a conflict may arise with the interests of the Company and with its subsidiaries which may interfere with its ability to assume, in an impartial manner, decisions in the best interests of the Company and in full compliance with the provisions of the Code.

They must also refrain from taking personal advantage of disposals of corporate assets or of business opportunities that they have learnt of in the course of performing their duties.

Any situation that may constitute or determine a conflict of interest must be promptly communicated by the personnel to their supervisor or company representative, or to the body responsible for overseeing the Code.

In particular, all personnel of SSE is required to avoid conflicts of interest between personal and family economic activities and the positions they hold within the relevant structure.

5.3 CULTURE OF SAFETY AND HEALTH PROTECTION AND OF THE ENVIRONMENT

SSE undertakes to guarantee a working environment that is compliant with current environmental and health and safety standards, promoting responsible behaviour and preserving, by monitoring, managing and preventing risks related to professional activity, the health and safety of all personnel as well as environmental impacts.

All personnel are required to strictly respect the rules and obligations deriving from the relevant legislation on health, safety and the environment, as well as ensure compliance with all the measures required by internal procedures and regulations.

The personnel, as part of their activities, participate in the process of risk prevention, environmental protection and the protection of health and safety relating to themselves and to colleagues and third parties.

6 – BEHAVIOURAL RULES: PUBLIC ADMINISTRATION AND OTHER THIRD PARTIES

The relations between the SSE and the Public Institutions are based on the principles of correctness, transparency and collaboration. Any type of behaviour that may be due to a collusive nature or that is capable of compromising the principles expressed in this Code is refused.

6.1 PRINCIPLES OF CONDUCT

The undertaking of commitments with Public Administrations and Public Institutions are reserved for the designated and authorised functions. SSE rejects any behaviour that can be interpreted as a promise or offer of payments, goods or other utilities of various kinds in order to promote and favour own interests and to benefit from them. Any participation in public tenders as well as the preparation of the related documentation are governed by the provisions of the text of the single call for applications and are carried out in compliance with the principles of honesty, transparency and fairness. Similarly for the subsequent management of the contribution received from the Public Body or from accredited agencies in this regard, conduct is in compliance with the provisions of the text of the single call and of the principles of honesty, transparency and fairness.

It is the commitment of SSE to avoid any form of gift to public officials or to public service officers of any kind, Italian or foreign, or their family members, even through a third party, that could influence the independence of judgment or result in securing any advantage to SSE. Gifts or free donations are only permitted if they are of a modest value and, in any case, if they cannot be interpreted in any way as being

an instrument to receive illegitimate favours, and always in compliance with the internal procedures set out in this regard.

Any employee who receives, directly or indirectly, proposals for benefits from public officials, persons in charge of public service or employees in general from the Public Administration or from other Public Institutions in a similar sphere, must immediately report such fact to the Internal Body overseeing the application of the Code, if dependent, or to its referent, if third party.

6.2 PREVENTION ON SIGNS OF RECOGNITION

It is forbidden to put in place, promote, collaborate or give cause to the conduct of behaviours that, taken individually or collectively, directly or indirectly, integrate the types of crime falling within those considered in article 25 *bis* of Italian Legislative Decree no. 231/2001 and subsequent amendments and additions.

By way of mere and non-exhaustive example, Recipients are specifically prohibited from:

- 1) Putting on sale or otherwise placing on the market industrial products with names, brands or distinctive signs capable of misleading the purchaser on the origin, provenance or quality of the products;
- 2) Introducing into the territory of the State, holding for sale, placing on sale with direct offer to consumers or placing in circulation goods made by usurping an industrial property owned by third parties.

7 – PROTECTION OF CORPORATE ASSETS

7.1 RETENTION AND MANAGEMENT OF RESOURCES

SSE works to ensure that the use of available resources - carried out in compliance with current legislation and with the contents of the by-laws, and in line with the values of the Code- is aimed at ensuring, increasing and strengthening corporate assets, to protect the Company itself, shareholders, creditors and the market. Therefore, the use of company assets must be in compliance with the law and regulations in force and in accordance with company procedures.

7.2 INTELLECTUAL PROPERTY

SSE adopts appropriate measures and initiatives aimed at ensuring the security, integrity, correct use and operation of computer, software or data systems or data of the Company or of third parties, also protecting intellectual property rights related to the use of programs and IT and telematic data and the integrity of the information made available to the public via the Internet.

SSE uses names and trademarks, as other distinctive signs, of exclusive property and/or whose use is available to the Company's through a legitimate use title. The Company undertakes not to make any device and/or use, in any form or manner, of brands and names and of other distinctive signs, even combined, of which it does not hold exclusive ownership and/or legitimate title to use.

In particular, in the context of relationships with suppliers, when the formulas and/or compositions of goods or brands to be used for supplies are not indicated or provided by the Company, the same implements adequate safeguards to ensure that the supplier guarantees that the goods and their intended use do not violate third party rights concerning industrial property (trademarks or patents).

In such relationships, the Company adopts adequate indemnity measures for any claim, legal action and compensation request made by third parties due to unfair competition, infringement of patents or patent

applications, trademarks or registered models and trademarks and of industrial and intellectual property rights related to raw materials, semi-finished products, finished products or services purchased from third parties.

Finally, SSE exclusively uses creative ideas or elaborations over which it has exclusive ownership.

7.3 COMPUTER SYSTEMS

SSE establishes the absolute prohibition on the part of the Recipients of this Code to alter in any way the functioning of an IT or telematic system or to interfere without any right or in any way with the data, information or programs contained in one of the afore-mentioned systems.

8 – CONTRIBUTIONS AND SPONSORSHIPS

The Company does not provide funding, contributions, advantages or other benefits, direct or indirect, to political parties, individual candidates, movements, committees associations, organisations and public administrations or trade union organisations, or their representatives, both in Italy and abroad, unless in compliance with the applicable regulations and in full transparency and in compliance with the applicable internal corporate procedures.

The Company condemns any form of pressure, direct or indirect, by political exponents.

The Company may engage in sponsorship activities, provided they are lawful and are consistent with its appreciable interests. These activities - which, by way of example, must be able to address the social, environmental, as well as the sporting and artistic aspects - must concern events that offer guarantees of quality and professionalism, and must be adequately documented.