

GE.S.A.C. S.p.A.

SOCIETÀ GESTIONE AEROPORTI CAMPANI S.p.A.

ORGANISATION, MANAGEMENT AND CONTROL MODEL
(AS PER LEGISLATIVE DECREE NO. 231 OF 8 JUNE 2001)

CODE OF ETHICS FOR SUPPLIERS AND PARTNERS OF GE.S.A.C. S.p.A..

REV	DATE	NATURE OF THE REVISION
00	27/01/2023	First issue
01	25/07/2023	The Code has been revised to comply with the new regulations on Whistleblowing set out in Legislative Decree 24/2023

Background and Purpose

GE.S.A.C. S.p.A. (hereinafter also referred to as "GE.S.A.C." or the "Company") created a Code of Ethics for its Suppliers and Partners (hereinafter also referred to as "the Code") in order to set up behavioural rules that suppliers and business partners must adhere to in their dealings with the Company.

Compliance with this Code is essential to ensure responsible conduct and the highest ethical standards in the relations between all the Recipients of the Code, also in line with the provisions of Legislative Decree 231/2001.

Suppliers and business partners are required to adhere to principles of loyalty, transparency and fairness in addition to the other rules of ethical conduct contained in the Code, which provides guidance to all those involved in business relations with the Company, by identifying shared values and principles.

The rules of conduct contained in this document are in line with the provisions of the Organisation, Management and Control Model adopted by the Company with the aim to minimize the risk of contravening the dictates of Legislative Decree 231/2001.

Rules of conduct that apply to Suppliers and Partners

1. Labour and human rights

The Company recognizes the central role played by human resources, and protects their rights while supporting their value. Suppliers and partners are required to adhere to the Company's policies, and to comply with the laws and regulations of the countries in which GE.S.A.C. operates. They must also guarantee equal opportunities and equality to their employees, treat them with dignity and respect and protect their physical, moral and intellectual integrity, while respecting cultural diversity and opposing any form of discrimination.

2. Ethics, fairness and fight to corruption

Under the Protocol of Legality it signed with the local Prefecture, the Company is committed to complying with its provisions and to ensure that all its Suppliers and Partners follow suit.

This means that all its Suppliers and Partners must act in accordance with the principles of fairness, cost-effectiveness, quality and lawfulness, and with the diligence of a good family man.

Furthermore, they must be independent in the performance of their work, in order to avoid any form of conflict of interest.

If a potential conflict of interest arises, communication between the supplier and/or partner with the Company will be essential in order to resolve the issue.

3. Transparency

GE.S.A.C.'s suppliers and partners are required to perform their activities according to principles of transparency and fairness, pursuant to Legislative Decree 231/2001 and its annexes. Furthermore, they

must operate with the utmost transparency, in compliance with the laws and regulations that apply to their specific industry and with the commitments they undertook with the Company.

4. Health and safety

Health and safety at work are among GE.S.A.C.'s top priorities. Accordingly, suppliers and partners are required to comply with the current health and safety legislation, guaranteeing their employees and collaborators a safe and healthy working environment, according to the sector in which they operate and the occupational risks associated with it.

5. Environmental protection

GE.S.A.C. considers the environment as a shared resource to be safeguarded for future generations, and undertakes to put in place all the necessary measures to protect it.

Economic, environmental and social sustainability are priority areas for the Company, in line with its vision statement, and accordingly suppliers and partners are required to comply with current legislation on environmental protection and the prevention of related crimes.

6. Anti-money laundering

The Company is committed to complying with all national and international anti-money laundering laws and regulations.

Therefore, suppliers and partners must not, in any way and under any circumstances, receive or accept cash payments or run the risk of being involved in money laundering activities

7. Gifts, gratuities or other benefits

GE.S.A.C. has established a policy on gifts, gratuities or other benefits. Company employees may not ask for, receive or pay gifts, gratuities or other benefits, except those of modest value or qualifying as acts of mere commercial courtesy.

Suppliers and partners are required to comply with the Company's rules on gifts, gratuities or other benefits

8. Confidentiality of information

Information that is confidential and proprietary to GE.S.A.C. shall not be used, communicated or disclosed without specific authorisation from the Company. Therefore, GE.S.A.C.'s suppliers and partners are required to use confidential information in an appropriate way and to limit access to such information to personnel who need it in the course and scope of their jobs.

Whistleblowing

The Company's suppliers and partners are responsible for ensuring compliance with the rules and principles set out in this document, both internally and along the Supply Chain.

In particular, the suppliers and partners of the Company who become aware of conduct, acts or omissions that harm the public interest or the integrity of the Company, namely violations of national legislative provisions (e.g. administrative, accounting, civil or criminal offences, unlawful conduct pursuant to Legislative Decree 231/01 or violations of the Organisation, Management and Control Model pursuant to Legislative Decree 231/01 and the Company's annexes thereto) or of European regulatory provisions (e.g. acts or omissions that damage the Union's financial interests) are required to promptly report such violations to the Whistleblowing Committee or to the GESAC Ethics Committee and to cooperate in internal investigations.

The report made to the Whistleblowing Committee or to the Ethics Committee (limited to conduct, acts or omissions committed by one or more members of the Whistleblowing Committee, as well as by one or more members of the Supervisory Board of the Company, or to violations of principles relating to conflict of interest) may also be made anonymously, provided that it concerns a circumstantiated case of unlawful conduct, based on precise and concordant facts, of which it has become aware in the work context.

Whistleblowers are protected from retaliation, defined as "any conduct, act or omission, even if only attempted or threatened, committed by reason of the report, the complaint to the judicial or accounting authorities or public disclosure and which causes or is likely to cause the whistleblower or the person lodging the complaint, directly or indirectly, unjust damage".

In addition, the Company also guarantees protection measures for:

- facilitators, i.e. persons assisting the whistleblower in the reporting process, operating within the same employment context;
- persons in the same employment context as the whistleblower who are linked to the whistleblower by a stable relationship or kinship up to the fourth degree;
- co-workers of the whistleblower who work in the same employment context as the whistleblower and who have a regular and current relationship with the whistleblower;
- entities owned by the whistleblower or for which the same persons work, as well as entities operating in the same work context as the aforementioned persons.

The Company has adopted the document "Whistleblowing Policy", to which reference should be made, aimed at regulating the organisational and procedural aspects of whistleblowing, as well as illustrating all the reporting channels (internal and external) available to whistleblowers, in addition to indicating the protections guaranteed to whistleblowers who report facts and unlawful conduct of which they have become aware.

In the event of an ascertained breach of the Code of Ethics for Suppliers and Partners, the Company may, by virtue of the agreements set out in the various contracts, terminate the relationship with the Suppliers and/or Partners, in compliance with the provisions of GE.S.A.C.'s disciplinary system.

Code Monitoring and Non-Compliance Management

GE.S.A.C. reserves the right to carry out monitoring activities to assess the compliance of suppliers and partners with the provisions of this document.

To this aim, the Company may request the necessary documentation or conduct audits at their production sites or offices.

If non-conformities are found, the Company will, in the first instance, seek a solution through dialogue with the third party concerned. However, if the non-conformities are deemed serious, the supplier's or partner's qualification may be suspended or cancelled.