

SEA Supplier Code of Conduct¹

version dated may 2022

SEA identifies its Suppliers based on qualification and selection criteria aimed at assessing their ability to meet SEA's needs and the values SEA intends to promote, including evolving toward a more sustainable and inclusive business concept.

To this end, SEA incorporates internationally accepted sustainability principles into its procurement activities².



1. Basic sustainability principles

Adherence to the above principles and the adoption of the consequent behaviours, as described below, is the basis of the business partnership between SEA and its Suppliers, including with reference to the respective supply chain³.

1.1 Environmental protection and environmental sustainability

As part of the constant improvement of its environmental efficiency, SEA has adopted certified Environmental and Energy Management Systems (ISO 14001 and ISO 50001) and adheres to the international environmental sustainability program "Airport Carbon Accreditation" of Airports Council International.

In this context, SEA requests that its Suppliers, including with reference to their respective supply chains, commit to minimising the environmental impact of their activities, including through the use of energy from renewable sources, proper waste disposal, containment of greenhouse gas emissions and mitigation of impacts on biodiversity and ecosystems. The adoption of certified environmental management systems and the use of the current Minimum Environmental Criteria (CAM), as defined from time to time by the competent authorities, is viewed positively.

1.2 Community involvement

SEA plays an important development role for the area in which it operates, generating value in economic and employment terms.

¹ SEA is understood to mean Sea S.p.A. and the set of companies controlled by it

² UN Universal Declaration of Human Rights, International Labour Organization Declaration on Fundamental Principles and Rights at Work, International Labour Organization Conventions, Ten Principles of the UN Global Compact, UN Guiding Principles for Business and Human Rights, OECD Guidelines for Multinational Enterprises and UN Agenda 2030 Sustainable Development Goals

³ The supply chain also includes subcontractors

SEA likewise asks its Suppliers to play an active role in the development of the local community, including through its own supply chain operating in that context, while always safeguarding the objectives of value for money that characterise SEA's actions.

1.3 Protection of human and labour rights

SEA bases its business organisation on the observance of the principle of non-discrimination by race, colour, religion, age, gender, sex and sexual orientation, language, nationality, background and social status, political opinions, union membership, health condition or disability.

Similarly, SEA requires its Suppliers, also with reference to their supply chain, to ensure compliance with the same principles in the management of their business activities, and warrant that, under no circumstances, may forced labour, child labour, or any form of illegal exploitation of workers be used.

1.4 Occupational safety and health

SEA has certified employee health and safety management systems, obtaining ISO 45001 certification for Sea S.p.A.

Similarly, SEA demands that its Suppliers, also with reference to their respective supply chain, ensure a safe and healthy working environment that complies with all European and national occupational health and safety regulations, implementing all those measures required by current legislation on the prevention of accidents at work and occupational hygiene, including adequate specific training for their employees, and the adoption of certified employee health and safety management systems.

1.5 Adoption of corporate governance tools

SEA has a Code of Ethics that identifies the values, principles and rules that inspire its behaviour. In addition, each Group Company has an Organisation, Management and Control in line with Legislative Decree 231/2001. Relevant documentation can be found on SEA's respective institutional websites.

In this regard, SEA expects its Suppliers to adopt appropriate corporate governance tools in pursuit of these goals while acting at all times with the highest degree of ethical integrity, honesty, transparency and good faith in a relationship of genuine reciprocity. Adherence to ethical best practices must be the common heritage of all SEA's Suppliers, including with reference to their supply chain.

1.6 Fair competition

SEA requires that the relationship with Suppliers be based on the loyalty that comes from common interest.

To this end, it promotes fair competition among them with transparent, non-discriminatory selection procedures, inspired by criteria of value and effectiveness, managed in such a way as to ensure full compliance with EU principles, such as equal treatment, free competition and non-discrimination, to safeguard a competitive process free from distortion.

The same behaviours must constitute the conduct of Suppliers towards their own supply chains.

1.7 Prevention of bribery and conflicts of interest

As stipulated in its Code of Ethics, SEA is committed to preventing and combating unlawful practices. Sea S.p.A. has adopted a Management System for the Prevention of Bribery, certified according to UNI ISO 37001:2016 "Anti-bribery Management System," the policy for which is available on the institutional website.

SEA expects its Suppliers, including with reference to their supply chains, not to practice or tolerate any form of bribery, either in general within the scope of their activities or in particular in order to obtain the awarding of contracts by SEA.

1.8 Information use, intellectual property and privacy

SEA and its Suppliers, including with reference to their related supply chains, mutually commit to respect intellectual property rights, protect confidential information, and comply with privacy and data protection regulations. In particular, intellectual property rights, copyrights, patents, trademarks, domain names, and trade secrets are understood to be included.

In this regard, Suppliers undertake to manage the transfer of technology and know-how in such a way that intellectual property rights are protected at all times.

1.9 Information security-Cybersecurity

SEA adopts high levels of digital information security to prevent vulnerabilities related to cyber risks, and the information security management system adopted by Sea S.p.A. is ISO 27001 certified.

SEA's Suppliers undertake, also with reference to their own supply chain, to implement all necessary measures to ensure maximum security and protection of the digital information acquired. SEA

promotes the adoption by Suppliers of operating methodologies and procedures that conform to the guidelines recommended by international standards.

1.10 Quality and corporate reputation

SEA is constantly striving to ensure the highest standards in the services it provides. In this regard, it has obtained ISO 9001 certification, and in order to ensure the full usability of its infrastructure for persons with reduced mobility, Sea S.p.A. is also committed to the standards set forth in D-4001 certification.

SEA likewise requires that its Suppliers, also with reference to their respective supply chain, commit to high quality standards in the performance of the required services.

SEA believes that its corporate reputation and image are a valuable asset.

Suppliers, also with reference to their respective supply chain and the actions of their employees, must therefore warrant, through their performance, the protection of SEA's image and reputation, as well as their own.

2. Compliance with regulations

Suppliers are required to comply with the regulations of the nation in which they are based, as well as with Italian law, including law derived from the European Union.

In addition, when dealing with SEA, Suppliers must also adapt their behaviour to SEA's procedural system, its Organisation and Management Model pursuant to Legislative Decree 231/01 and the principles contained in its Code of Ethics.

3. Monitoring, violations and reporting

SEA reserves the right to proceed periodically to verify the compliance of its Suppliers with the principles set forth in this document and the specific contract provisions.

At any time, should behaviour or events attributable to the Supplier emerge that highlight inconsistencies with the principles and actions set forth in this Code, SEA shall support the Supplier so that the Supplier can, where possible, take timely action with appropriate corrective measures. However, should the above inconsistencies result in serious non-compliance, or in the case of repeated violations of the principles

of SEA's Organisation and Management Model pursuant to Legislative Decree 231/01 or Code of Ethics, SEA reserves the right to exercise all contractual remedies to safeguard its image and interests.

To report any acts contrary to the principles of this Code by SEA and/or Suppliers, a whistleblowing platform is available at the following link:

<https://milanairports.com/it/governance/etica-e-compliance/whistleblowing>

Signature

I, the undersigned **insert full name**, as the Legal Representative/Attorney **Enter the appropriate role** of **insert company name**, aware of the responsibility that signing this Document entails, hereby declare that I accept its guiding principles and undertake to abide by them at all times in our business relationship with SEA.

Legal Representative/Attorney
(digital signature)

Courtesy Translation: in case of discrepancy between the Italian language original text and the English language translation, the Italian version shall prevail