

# **VENDOR CODE OF CONDUCT**

## **SAIPEM'S EXPECTATIONS TOWARDS ITS VENDORS**

# INTRODUCTION

The purpose of this document is to describe the minimum requirements and expectations of Saipem towards its vendors, including contractors, suppliers and service providers, their employees and sub-vendors. These requirements provide additional detail of the principles our vendors are asked to comply with, according to the Saipem Code of Ethics and represent the foundation of our purchasing process to guarantee a long-term relationship with our vendors.

These requirements, as described in this document, are not replacements or substitutes for Saipem Code of Ethics itself, for other mandatory Saipem documents or applicable laws, nor do they amend contracted obligations.

We expect our vendors, their directors, employees, sub-suppliers, agents, insurers, shareholders, consultants and any other person representing them or acting on their behalf, to observe and abide by the principles of Saipem's Code of Ethics and always act in

accordance with the following requirements. We ask that vendors communicate these requirements to all their own employees, sub-vendors and business partners. We reserve the right to take appropriate measures against those who do not meet the requirements and do not act in accordance with these principles. Under no circumstances, acting in favour or in the interest of Saipem, may even partially justify behaving in conflict with such principles on the part of Vendors.

***This document contains general requirements applicable to all Saipem's vendors. Contracts clauses and General Terms and Conditions (GTC) may contain more specific provisions addressing some of the same issues. To the extent, if there is any inconsistency between this document and any other provision of a contract/GTC, vendors must comply with whichever provision is stricter.***



## ETHICS AND COMPLIANCE

Saipem's vendors must:

Comply with applicable international, EU, national, regional and local laws and regulations, including those regarding the execution of the specific contract with Saipem, the vendor's activities and the goods and services being provided.

Guarantee accounting transparency through the use of true, accurate and complete information as the basis for the corresponding book entries.

Promote transparency and accountability in the conduct and administration of business, including ensuring an adequate and effective internal control system that provides processes and procedures to proactively prevent:

- > Bribery and corruption
- > Money laundering
- > Conflicts of interest
- > Anti-competitive conduct
- > Confidential information disclosure
- > Improper gifts or forms of hospitality of any type to Saipem personnel or third parties representing Saipem.

Promote awareness among the vendor's employees and any related party on the above processes and procedures.

Comply with all applicable laws and regulations relating to anti-bribery and anti-corruption, including the Saipem Code of Ethics and Saipem Management System Guideline Anti-corruption.

Prohibit without any exception bribes, illegitimate favours, collusion, requests for personal or career benefits for oneself or others, either directly or through third parties. Undertake not to make Facilitation Payments.

Not seek to obtain an improper advantage or improperly influence the ability of Saipem's employees to make valid, impartial and objective decisions in the best interest of Saipem.

Avoid and report promptly any situation that is or may appear an actual, potential or perceived conflict of interest with Saipem in any way (this includes situations in which Suppliers are aware, or should have been aware, of the circumstance that a Saipem Director, manager, employee has a direct or indirect financial, economic or personal interest in the Supplier's business, company or its shareholding structure).

Comply with Saipem Code of Ethics gift and hospitality provisions and undertake not to offer gifts or hospitality to third parties on behalf of Saipem.

## HUMAN RIGHTS AND MODERN SLAVERY

Saipem's vendors must:

Respect the human rights and dignity of all people in accordance with the Universal Declaration of Human Rights.

Ensure that working conditions, including contracts, working hours, overtime and compensation of workers are consistent with human dignity, local legislation and the principles defined by the International Labour Organization.

Ensure no use of child labour, forced or compulsory labour, human trafficking, slavery or servitude, and that work is conducted voluntarily, without threat of penalty or sanction and not based on deception. Ensure compliance of recruitment practices with international standards of employment.

Prohibit any form of discrimination, including, but not limited to, discrimination on the grounds of gender, race, colour, religion, ethnic, national or social origin, marital status, family responsibilities, sexual orientation, political or other opinion, union membership, nationality, property, birth or other status including health status, disability, or age.

Prohibit any form of physical, sexual or psychological harassment, intimidation, inhumane treatment, humiliation or abuse. Furthermore, disciplinary practices shall be compliant to international standards and local legislation reflected in internal policies communicated to the personnel.

Respect, without discrimination, workers' right to freedom of assembly and association, to organise and to collective bargaining and to form trade unions. In places where these rights are restricted, we expect vendors to still ensure effective worker-employer collaboration. In case child labour is discovered in vendor's sites or along the supply chain, remediation actions shall be defined in accordance with international best practices and Saipem Child Labour remediation procedure.

## DIVERSITY, EQUALITY & INCLUSION

Saipem's vendors must:

Inspect the Diversity, Equality & Inclusion Policy, through which Saipem is committed to promoting and supporting the values of diversity and inclusion, through the adoption of organisational and management solutions aimed at creating a collaborative harmonious, fair, supportive work environment and that recognises values diversity, guiding and inspiring corporate programmes and processes in all Group Companies, in coherence and respect for local specificities and strategies.

In particular, the priority areas are: inclusive culture; training; multiculturalism; professional development; fair

pay; leadership; inter-generational; disability; wellbeing; communication.

Vendors must be guided by the corporate values promoted in the Policy, while respecting transparency, non-discrimination and equal treatment.

## HEALTH, SAFETY, SECURITY AND THE ENVIRONMENT (HSSE)

Saipem's vendors must:

Conduct business in a way that supports Saipem's HSSE vision of zero accidents, zero harm to people and zero damage to the environment.

Ensure all workers have a healthy and safe workplace where they are protected from accidents, injuries, and work-related illness, including promotion of mental wellbeing of all personnel. Working hours and conditions should not jeopardize the individual worker's health, safety or wellbeing.

Take a systematic approach to managing operating activities and HSSE risks, complying with applicable HSSE laws and regulations, and seeking to continuously improve health, safety, security and environmental performance.

Assess the risks that personnel may be exposed to, not only while working but inclusive of those that may be present when travelling and, during rest and recreation in the course of their employment.

Encourage your workforce and subcontractors to report any accident, injury, illness, or unsafe condition immediately, and stop work that could be unsafe, so that appropriate action can be taken.

Safeguard workers from threats and dangers belonging to the operational environment (OE), also by applying internationally recognised best practices and standards such as the Voluntary Principles on Security and Human Rights.

Conduct activities complying with laws and regulations, as well as with Saipem's requirements for minimising impacts on the environment, protecting biodiversity and ecosystems, optimising the use of energy and natural resources, including the implementation of responsible waste management practices, in all operations.

Collaborate in initiatives and practices promoted by Saipem and contribute to reporting processes, including through the use of suitable reporting tools, thus contributing to the improvement of sustainability

performance and the achievement of Saipem's targets regarding energy efficiency and reduction of greenhouse gas emissions.

## LOCAL COMMUNITIES

Saipem's vendors must:

Respect the cultural, economic, social and human rights of the communities in which you operate, including those in relation to the use of land, water and other natural resources.

Contribute to the local development by providing job opportunities and develop local business in the areas of your operations.

## INFORMATION AND DATA PROTECTION

Saipem's vendors must:

Comply with all obligations under applicable data protection law, including regulations on handling and storage of personal information.

Ensure all personal data is deleted or anonymised when no longer necessary for the relevant purpose the data was collected.

Ensure effective protocols in place for securing and protecting Saipem information, data processed and email communications through the adoption of the latest best practices.

Promptly report any suspected or actual information security incidents that could affect Saipem and its stakeholders as soon as practically possible.

Ensure the confidentiality required by the circumstances for each piece of information acquired.

## WHISTLEBLOWING PROCESS

Saipem's vendors must:

Report, even anonymously and without fear of retaliation, actual or potential ethical concerns on Saipem's whistleblowing internet channels (link).

Provide a process for employees to report (also anonymously), without fear of retaliation, any violation or activity inconsistent with the requirements as defined in this document.

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**SAIPEM SpA**  
Via Luigi Russolo, 5  
20138 Milan - Italy

**SAIPEM.COM**