

BURGO GROUP S.P.A.

Executive Summary of the Code of Ethics for Sustainable Procurement - ESG

Suppliers and Third-Party Collaborators

INTRODUCTION

Burgo Group is the most important group operating in Italy in the paper production and distribution sector and its main activity is also accompanied by the production and sale of fibrous raw materials and energy.

Burgo Group pursues the goal of disseminating principles of environmental, social and governance sustainability (summarised in the acronym "ESG") both internally and in its external relations.

The Code of Ethics, approved by the Board of Directors of Burgo Group to supplement and complete the Organisational, Management and Control Model adopted by the Group according to the Italian Legislative Decree 231/01, is the document that sets out the general ethical values and principles of business conduct inspiring Burgo Group's Activities.

The Code of Ethics is available on the Group's website at the following link: <https://www.burgo.com/esg/policies>

All suppliers and third-party intermediaries of Burgo Group (e.g., agents, consultants, joint venture partners, local partners or distributors acting on behalf of Burgo Group) must comply with the standards established in this Executive Summary for suppliers and third-party collaborators of Burgo Group or demonstrate their compliance with similar standards defined in their own Codes of Ethics or company codes.

This Executive Summary for sustainable procurement forms an integral part of all contracts between Burgo Group and its Suppliers and aims at promoting the creation of sustainable value between the parties; this document must be considered immediately binding even without express, formal acceptance, as it constitutes a fundamental pillar of mutual trust relationship.

PURPOSE OF THE CODE OF CONDUCT FOR SUPPLIERS

Taking into account the principles approved by its own internal regulations (e.g. in its Code of Ethics mentioned above), Burgo Group intends to extend the integration of these sustainability principles to the process of selecting its suppliers, basing its choice not only on the quality and competitiveness of the products and services offered, but also on their social and environmental performance and their adherence to ethical values, which are therefore a fundamental prerequisite for any collaboration and supply relationship.

Burgo Group has therefore **arranged** the present Executive Summary for Suppliers, which states its minimum standards of conduct and fundamental practices in carrying out its activities so that also its Suppliers (including their subcontractors, sub-subcontractors and other parties working on their behalf) can comply with them, adopting socio-environmental behaviour and ethical values in their supply chain.

DEFINITIONS

For Burgo Group, suppliers are defined as companies or people who manufacture goods, commercialize goods or provide services, including suppliers of all materials and services, contractors, consultants, outsourcing services, distributors and other business partners.

GENERAL OBLIGATIONS

1. Commitment to integrity

Each supplier or third-party collaborator of Burgo Group must

- Comply with all applicable laws and regulations.
- Immediately inform his Burgo Group's contact in case of inability to comply with the Executive Summary for suppliers and third-party collaborators.

2. Respect for individuals and human rights

Burgo Group's suppliers or third-party collaborators must:

- Respect the universal rights of the individual such as freedom of thought, opinion, expression and religion, as well as protection against any discrimination on the grounds of race, age, nationality, gender, sexual orientation or any kind of harassment.
- Respect local laws on working hours and pay, freedom of association and the right to collective bargaining.
- Respect the rights of children and never use or tolerate any form of child labour. Respect the minimum age set by local national laws or the minimum age of 16 years defined by the International Labour Organisation (ILO) if higher.
- Ensure that no forced labour is used or tolerated in any of its operations or activities.
- Ensure the health and safety of employees, visitors and other people involved in its activities.
- Respect the safety requirements of Burgo Group when visiting or working at Burgo Group's sites and carry out the necessary safety training.

3. Pay attention to the environmental impact and product safety

Burgo Group's suppliers or third-party collaborators must

- Minimise its negative environmental impact on soil, water, biodiversity, climate, and air.
- Manage all waste in compliance with applicable laws and the manufacturer's instructions.
- Ensure that products are safe for their intended use.

4. No tolerance for corruption

Burgo Group's suppliers or third-party collaborators must:

- Refrain under all circumstances from paying, supplying, offering, or approving bribes to public officials or private individuals, both directly and indirectly.
- Refrain under all circumstances from receiving, requesting or accepting bribes from anyone, both directly and indirectly.
- Refrain under all circumstances from any kind of bribery or other illegal or illicit business practices, such as extortion, embezzlement or fraud.
- Maintain adequate procedures to prevent corruption in its activities.

5. Commercial transparency

Each supplier or third-party collaborator of Burgo Group must

- Be a duly constituted and legitimate legal entity in accordance with the applicable laws.
- Be authorised to perform its activity, sign an agreement/contract with Burgo Group and fulfil the obligations resulting from the contract/agreement.

- Be aware of the risks to which he/she is subject, put in place adequate measures to mitigate the risks and immediately notify Burgo Group in case the risks may have an impact on Burgo Group's activities
- Scrupulously comply with all applicable tax laws and pay all taxes and any other official payments established by the authorities
- Scrupulously comply with all anti-money laundering legislation and applicable commercial sanctions regimes.
- Communicate to Burgo Group any actual or potential conflicts of interest related to its activities as a supplier or third-party intermediary of Burgo Group (these include personal affiliations between the employees of the supplier/third party intermediary and Burgo Group and any relevant financial interests that Burgo Group employees may have in the activity of the supplier or third-party intermediary).

6. Compliance with competition laws

Each supplier or third-party intermediary of Burgo Group must:

- Comply with all applicable competition laws and commit not to sign or undertake agreements, business practices or meetings with customers, distributors, suppliers or other business partners which may be considered as distortions of competition, or any other anti-competitive activity.

7. Protection of assets and information

The supplier or third-party collaborator of Burgo Group must:

- Carefully manage Burgo Group assets
- Protect any confidential information related to Burgo Group from unauthorized disclosure and use.
- process personal data in compliance with applicable laws.
- Refrain from publishing any announcement, press release or other public statement concerning Burgo Group without the approval of Burgo Group
- Respect the intellectual property rights of Burgo Group and other parties.

8. Characteristics of partners

Burgo Group's suppliers or third-party collaborators must

- Know and carefully select its business partners in order to identify and mitigate the risk of being involved in illicit business activities or violations of any requirement of this Executive Summary for third party suppliers and collaborators.
- Promote the requirements described in this Executive Summary for Suppliers and Third- Party Collaborators or any similar standards to other supply chain partners.
- Keep accurate and complete record of all business transactions.

9. Involvement of stakeholders and the community

Burgo Group's suppliers or third-party collaborators must:

- Communicate with its stakeholders in an open and transparent manner and promote mutual dialogue.

10. Compliance concerns everyone

Burgo Group's suppliers or third-party collaborators must:

- Allow Burgo Group to verify compliance with this Executive Summary for suppliers and third-party collaborators through dialogue and, if deemed necessary by Burgo Group, through on-site checks. Reasonable notice will be given in case of on-site audits, which will be conducted by internal or external resources of Burgo Group
- Answer accurately and promptly to Burgo Group surveys
- Be aware that any violation of the law or of this Executive Summary for suppliers and third-party collaborators, or failure to take corrective action, will be considered by Burgo Group as a breach of the contract and may entitle Burgo Group to terminate the business relationship with the supplier or third-party collaborator.
- Allow its employees to express their concerns about misconduct, suggest improvements or provide general feedback anonymously.
- Immediately report to its Burgo Group's contact any observed or suspected violation of this Executive Summary for suppliers and third-party collaborators that may impact the business relationship or Burgo Group itself

MONITORING

The Supplier must authorize Burgo Group, or a third party authorised by Burgo Group, to verify compliance with the requirements of this Executive Summary through dialogue, disclosure of information or, if deemed necessary by Burgo Group, through an audit of the Supplier's operations. Reasonable notice will be given in case of audits, which may be conducted by resources internal or external to Burgo Group.

The Supplier must also respond accurately and promptly to Burgo Group's requests for information concerning environmental, social and governance (ESG) sustainability.

Finally, the Supplier must be aware that any violation of the law or of this Executive Summary, or any failure to adopt corrective measures, will be considered by Burgo Group as a breach of contract and may authorise Burgo Group to terminate the business relationship with the supplier or third-party collaborator.

In the event of misconduct that may affect the business relationship or the activities of Burgo Group, the Supplier must give immediate notice; this communication must be given to the Supervisory Body of the relevant Companies using the following e-mail addresses. The access to the following e-mail addresses is strictly and exclusively reserved to the members of the Bodies themselves:

- Burgo Group S.p.A: odv@burgo.com
- Mosaico S.p.A.: odvmosaico@burgo.com
- Burgo Distribuzione S.r.l.: odvdistribuzione@burgo.com

Burgo Group will carefully examine any misconduct reports and will keep them strictly confidential.