

Supplier Code of Conduct



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Scope and field
of application

1



Edison intends to establish and strengthen relations with Suppliers that share the principles and values expressed in this *Supplier Code of Conduct*, *Code of Ethics*, *Sustainability Policy*, *Sustainable Procurement Policy* and *Protection of Human Rights Policy* and undertake to promote their adoption among their employees and the supply chain in which they participate. This Code sets out the principles and conduct required from Suppliers when they enter relations with Edison. Compliance is a fundamental condition for starting and maintaining a long-term relationship. This is to ensure that sustainable procurement themes are effectively applied throughout the supply chain.

In alignment with the *Sustainable Procurement Policy*, which defines the principles and methods that guide and characterise Edison's actions in its relations with its upstream supply chain, this *Supplier Code of Conduct* applies to suppliers from whom Edison directly and indirectly purchases works, materials, technical-industrial products, and services (hereafter referred to as "Suppliers").

The conduct standards described in this *Supplier Code of Conduct* supplement and do not alter any agreements, understandings or contracts stipulated with individual Suppliers regarding respect for human rights and environmental protection.

Consistent with the new Directives on Corporate Sustainability Reporting (CSRD) and Corporate Sustainability Due Diligence (CSDDD), Edison's commitment extends beyond the suppliers with whom the Company has direct business relations (layer 1), which is why Edison invites its suppliers to adopt their own Supplier Code of Conduct.

Linked below is a practical tool produced by the Global Compact Network Italy GCNI within the *Sustainable Procurement Work Table* containing guidelines with 11 key steps for the development and adoption of a Code of Conduct:

Click [here](#) for the link.



Edison's
commitment
to sustainability

2



As stated in its *Sustainability Policy* and as a responsible operator, Edison considers sustainable success and Environmental, Social, Governance (ESG) criteria fundamental levers of value creation in the medium-long term and key elements in defining strategic and operational choices.


Edison works towards the continuous integration of sustainability principles within its corporate structure, business model and processes, to drive the sustainable energy transition of customers, suppliers and communities.

Edison's commitment is inspired by the United Nations' Sustainable Development Goals (SDGs), to which it contributes through the Sustainability Plan's lines of action, corporate operations, and by the ten principles, defined within the framework of the United Nations Global Compact, concerning human rights, labour standards, environmental protection and the fight against corruption.

The Company is committed to a sustainable energy transition, focusing on low-carbon and green gases, promoting renewable energy and flexibility solutions, supporting residential, industrial and public sector customers in decarbonisation, monitoring and reducing climate-impacting emissions, and promoting sustainable mobility.

Based on a principle of technological neutrality aimed at decarbonisation, Edison believes in a socially responsible transition, which takes the form of promoting sustainable energy spending and combating energy poverty, developing and updating people's skills, responsibly managing its supply chain, respecting human rights in all forms and contributing to social progress.

Aware of the importance of building a reliable supply chain to create value for its stakeholders, and as stated in its *Sustainable Procurement Policy* Edison is committed to implementing and enforcing human rights and environmental due diligence in its value chain.



Supplier ESG
conduct
and reference
to Edison's
Sustainability
Policy principles

3



Edison's commitment to sustainability is structured around pillars that embody the Group's culture and objectives.



Climate action: action on climate change focusing on promoting decarbonisation



Natural Capital and Landscape: conservation and protection of natural capital and the landscape



Human Capital and Inclusion: developing human capital and promoting diversity and inclusion



Value for Customers, Local Areas and Sustainable Economic Development: creating value for customers and local communities, and promoting sustainable economic



Cross-cutting Themes - Prerequisites and Enabling Factors: business ethics, respect for human rights, sustainability in governance, sustainable finance and investment, innovation and digitalisation, stakeholder dialogue and engagement along the value chain.

These pillars are essential for applying the principles of the *Sustainable Procurement Policy* and fostering responsible practices throughout the supply chain.

Aware that sustainability challenges can only be addressed by involving all value chain stakeholders, and committed to maintaining a corporate approach of raising awareness and supporting Suppliers on sustainable procurement issues, Edison requires its Suppliers to adopt behaviours aligned with ESG principles and values outlined in the Edison Sustainability Pillars, and consistent with the UN Global Compact, Sustainable Development Goals (SDGs), and European CSRD standards on individual sustainability components (ESRS).

3.1 Environment

Principi 7,8,9 UNGC
SDGs 6, 7, 12, 13, 14, 15
ESRS E1 - Climate Change
ESRS E2 - Pollution
ESRS E3 - Water and marine resources
ESRS E4 - Biodiversity and ecosystems
FRS F5 - Resource use and circular economy

**Edison Sustainability Pillar:
Climate Action
Natural Capital and Landscape**



Climate action and combating climate change are a key focus within the Environmental area. For Edison, this entails a dual commitment: reducing the climate impact of its operations and adapting its infrastructure to enhance resilience. The goal is to ensure that essential services remain reliable and available even during climate emergencies. Edison's commitment to clean and affordable energy drives it towards reliable and sustainable economic systems with continuous investments in increasingly efficient and environmentally friendly production technologies.

To promote climate action, Edison requires Suppliers to:

- Assess and monitor climate-altering emissions along its value chain; make its assets efficient and promote the reduction of direct climate-altering emissions by implementing a decarbonisation and sustainable mobility process
- Favour the use of renewable or low-carbon energy resources, and minimise potential and actual negative environmental impacts
- Integrate and promote the principles of environmental sustainability and climate change mitigation within its supply chain

Edison values natural resources and ecosystems as essential for community well-being and global balance. It protects biodiversity by complying with environmental regulations and promoting initiatives to safeguard the environment and its species. Edison guarantees that its facilities respect landscape, cultural, and aesthetic values, striving to integrate energy considerations with the landscape to enhance the value of the regions where it operates.

Edison requires Suppliers to:

- Use natural resources responsibly and respectfully of future generations by reducing their consumption throughout the life cycle of their production processes, with a focus on ecosystems subject to water stress or high environmental value. Preserve and manage water resources responsibly, optimise its use, adopt solutions for the reuse of wastewater and report on water consumption.
- Reduce environmental impact by adopting circular economy practices and ensuring efficient, responsible management of waste, including hazardous materials.
- Identify, assess, prevent or mitigate environmental risks, exceeding legal obligations to prevent pollution (air, water, soil, groundwater) and environmental incidents, by implementing recognised environmental management systems and certifications. Act swiftly to remediate any damage resulting from an incident, ensuring responsible and sustainable environmental management.
- Monitor environmental conditions and assess the impact of their activities on the surrounding area.
- Promote initiatives to raise awareness of environmental issues
- Implement measures to gradually reduce the use of single-use plastics.
- Restrict deforestation linked to its operations and offset any remaining impacts through Natural Capital initiatives.

3.2 Social

Principi 1, 2, 3, 4, 5, 6 UNGC

SDGs 1, 2, 3, 5, 8, 10

ESRS S1 - Own workforce

ESRS S2 - Workers in the value chain

ESRS S3 - Affected communities

ESRS S4 - Consumers and end-users

**Edison Sustainability Pillar:
Human Capital and Inclusion
Value for customers, region and
sustainable economic development**



Edison sees human capital as a key element of its social responsibility and a determining factor for long-term value creation. Edison encourages maintaining high levels of employability through constant training. It supports and enhances the internal growth of its resources and their skills, promotes plurality, inclusion and workplace well-being. Occupational health and safety for its employees and workers throughout the value chain is a priority and an ongoing commitment.

The commitment to social responsibility is evident in Edison's customer-centric approach, built on trust through transparency, fairness, reliability and fostering long-term relationships. The company is dedicated to guiding and supporting customers, partners, and suppliers on a sustainability journey towards responsible, efficient production and consumption with lower environmental impact. Through innovation, this commitment helps enhance citizens' quality of life and generates added value for its supply chain and the wider system. The communities in which Edison operates are at the heart of a shared and widespread commitment to sustainability, through which economic and social development can be built.

Other references are contained in the *Diversity and Inclusion Policy*, *Protection of Human Rights Policy* and the *Relations with the Region and Local Communities Policy*

Edison requires Suppliers to:

- Take appropriate prevention and protection measures against any culpable or wilful behaviour, identify and manage health and safety risks that could cause actual or potential negative impacts on people in the workplace
- Manage these issues by providing training sessions and activities to Small and Medium Enterprises, raising workers' awareness to adopt behaviours in line with occupational health and safety regulations and best practices.
- Adopt behaviour in line with the principles and fundamental rights defined by the *UN Universal Declaration of Human Rights*, *UN Global Compact* and *Charter of Fundamental Rights of the European Union*, to prevent or avoid that their operations generate actual or potential negative impacts on human rights. Suppliers must:
 - Prohibit forced, illegal and bonded labour¹, and all forms of modern slavery and human trafficking.
 - prevent child labour
 - ensure respect for workers' rights and trade union freedoms, including freedom of association and the right to collective bargaining.
 - provide working hours and rest periods that comply with applicable regulations and best practices. Adapt overtime policies to applicable laws, ensuring that they do not exceed established limits, and mandatory hours are governed by local regulations or collective agreements. Ensure the right to sick leave, parental leave, holidays and other leave under applicable regulations
 - reject any form of discrimination or prevarication
 - define clear and fair working conditions within a contract for each employee. Ensure fair wages, sufficient for a decent standard of living, based on skills and merit. Prohibit disciplinary deductions and recruitment commissions
 - recognise and responsibly manage the risk of negative human rights impacts associated with the extraction and trade of minerals, especially those from high-risk and conflict

¹ Any work or service extorted from a person under threat of punishment or for which that person has not offered themselves voluntarily (ILO Convention no. 29)

areas, through an active due diligence programme based on OECD guidelines and the Responsible Minerals Initiative (RMI) standards.

- recognise and protect fragile groups (migrant workers, the disabled, young people, elderly, women, indigenous workers, LGBTQIA+)
- promote a working environment that values individual diversity, talent and unique contribution to the organisation

- Provide accessible, quality and value-added goods or services
- Engage with stakeholders
- Contribute to regional and community sustainable development
- Manage their supply chain responsibly by assessing the S profile of their suppliers.

3.3 Governance

Principio 10 UNGC

SDGs 16, 17

ESRS G1 - Business conduct

**Edison Sustainability Pillar:
Cross-cutting themes, prerequisites,
and enablers**



Edison has implemented a robust Ethics & Compliance framework comprising tools and policies designed to combat and prevent bribery and corruption. Outlined below are the key instruments that underpin Edison's governance: *Code of Ethics; Organisation, Management and Control System 231; Anti-Corruption Guidelines; Integrity Check Guidelines; Anti-Fraud Policy; Whistleblowing Policy; Training Courses* - Focus is paid to business integrity issues and the "zero tolerance" principle towards fraud and corruption.

The Company is committed to establishing relations with third parties based on fairness and transparency, avoiding misleading information and conduct that takes advantage of others' positions of weakness or lack of knowledge.

Edison requires Suppliers to:

- Comply with applicable regulations and observe the best internationally recognised standards
- Refrain from offering, promising, giving, paying or authorising anyone to give or pay, directly or indirectly, goods or other benefits to a public or private entity in pursuit of unlawful purposes
- Refrain from accepting (or authorising anyone to accept) any request or solicitation from a public or private entity, directly or indirectly for financial or other advantage
- Avoid improper advantages and refrain from abusing a possible dominant market position
- Avoid interfering in supplier pre-qualification and qualification processes, contract awarding, or authorisation.
- Ensure the widest possible transparency in relation to the information necessary for the conduct of the procurement process, refraining from communicating false or misleading information, or omitting relevant information, likely to influence the decision-making relating to supplier pre-qualification and qualification processes, contract awarding or subcontract authorisation
- Protect the personal data of the client company's representatives, contact persons, and individuals whose personal data is shared with Suppliers, under applicable laws and regulations. Implement adequate security measures to protect data and promptly inform the client company of any breach of security leading to loss, unauthorised disclosure, alteration, destruction or unauthorised access to personal data
- Ensure personal data confidentiality and protection under laws and best practices, using data only for legitimate purposes and take appropriate security measures.
- Respect the intellectual property rights of the client company and third parties diligently and seriously, ensuring that counterfeit parts are not tolerated at any stage of the production process.

3.4 Due diligence

Under the UN Guiding Principles, protecting human rights and the environment requires Due Diligence, a process companies use to identify, monitor, prevent, mitigate, remedy or terminate actual or potential negative impacts, as outlined by the CSRD and mandated by the CSDDD.

Edison requires Suppliers to:

- Implement processes to raise awareness and establish environmental and human rights due diligence, enabling the identification and assessment of actual or potential negative impacts across their supply chains, and plan appropriate countermeasures and remediation actions.
- Implement adverse impact reporting systems that protect whistleblowers, ensuring that there are no negative consequences or retaliation against employees



Training and Engagement

4



Edison is committed to sustainable supply chain management by fostering dialogue and collaboration with suppliers, creating a partnership between the company and its wider stakeholder ecosystem.

To put this approach into practice, Edison assists its suppliers in improving any gaps from industry best practices, identified through interviews and surveys, by offering awareness programmes, training sessions, and tailored solutions to strengthen their ESG performance. Edison created an information content and training platform on ESG issues open to its suppliers: the "[Sustainable Procurement Academy](#)".

The Sustainable Procurement Academy - created in partnership with ALTIS, Alta Scuola dell'Università Cattolica del Sacro Cuore di Milano - will provide suppliers with access to educational resources, tools and specialised courses on sustainability issues. Its goal is to provide Edison's suppliers, especially SMEs, with a "toolbox" to understand key sustainability concepts and manage ESG factors; for instance, to learn relevant national and EU legislation, identify ESG risks and opportunities, and develop strategies and action plans.



Collection,
monitoring and
management
of Code compliance



5

Given the Company's commitment to fostering fair and transparent relations with Suppliers, and engaging stakeholders in combating illegality through active and responsible participation, Edison has implemented a Whistleblowing system compliant with Legislative Decree No. 24 of 2023. This system allows reports of corruption, fraud, or other unlawful acts, and violations of human rights, environmental, health and safety standards, or other non-compliance, while guaranteeing confidentiality and protection against retaliation or discrimination. For reporting methods, please refer to the *Whistleblowing Policy* available at [www.edison.it\(https://www.edison.it/whistleblowing\)](https://www.edison.it/whistleblowing).

Edison requires Suppliers to make their reporting channels available to their employees and third parties with whom they interact in Edison's interest and allow anonymous reporting.

Edison has the right to verify compliance with the conduct rules set out in this *Supplier Code of Conduct* for Suppliers with whom it maintains a long-term relationship, through:

- Requests for clarification or documentation, including self-assessments of potential environmental and human rights impacts;
- On-site inspections at the Supplier's premises, carried out by mutual agreement.

In non-compliance cases, Edison engages in dialogue with the Supplier to guide them through a corrective process. The goal is to enhance the supplier's compliance and ensure their continued participation in the supply chain. However, failure to adhere to the principles and rules of this *Supplier Code of Conduct* may lead to the following actions, based on the severity of the impact:

- removal from the Supplier Register or Vendor List or
- temporary contract suspension if the supplier can respond positively in the short term through prevention and minimisation initiatives
- contract termination

The supplier accepts and undertakes to follow the principles set out in the Supplier Code of Conduct, passing this commitment on to Edison's subcontractors.



Appendix

6



Edison Supplier Code of Conduct Regulatory references and inspiring principles

Below is a list of laws, regulations, and internationally recognised principles that Edison regards as essential for its relationships with business partners. These standards are referenced in the Code, and which suppliers are required to acknowledge, uphold, and implement by signing the document.

- Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Tripartite declaration of principles concerning multinational enterprises and social policy (ILO MNE Declaration)
- ILO International Labour Standards on Occupational Safety and Health
- ILO Centenary Declaration for the Future of Work
- Rio Declaration on Environment and Development
- UN Agenda 2030 for Sustainable Development
- UN Global Compact Ten Principles
- UN Guiding Principles on Business and Human Rights
- Women's Empowerment Principles
- Children's Rights and Business Principles
- OECD Guidelines for Multinational Enterprises
- United Nations Convention Against Corruption
- International Covenants on Civil and Political and Economic, Social and Cultural Rights
- [ISO 14001 Environmental Management Systems](#)
- [ISO 14046 - Water Footprint - Principles, Requirements and Guidelines](#)
- [ISO 26000- Social Responsibility Guidelines](#)
- [ISO 20400 - Sustainable Procurement - Guidelines](#)
- [ISO 45001- Human Resource Management Systems- Diversity and Inclusion](#)
- [ISO 30415- Human Resource Management- Diversity and Inclusion](#)
- [SA8000- Social Responsibility](#)
- PDR 125 - Gender Equality Certification
- Privacy Regulation (EU) 2016/679

Useful links

UNGP's: [GuidingPrinciplesBusinessHR_EN.pdf \(ohchr.org\)](#)

CSDDD: [Directive \(EU\) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive \(EU\) 2019/1937 and Regulation \(EU\) 2023/2859. Text relevant for the EEA. \(europa.eu\)](#)

CSRD: [resource.html \(europa.eu\)](#) and its transposition in Italy through Legislative Decree 125/2024



Edison Spa

Foro Buonaparte, 31
20121 Milano
Tel. +39 02 6222.1

www.edison.it

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