

## Code of Ethics adopted by SOCIETÀ ITALIANA GAS LIQUIDI SPA

Revision approved by the Board of Directors at the meeting of 28.03.2025

### Introduction

From time SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed on the front of Corporate Social Responsibility and monitors the behavior and actions of all stakeholders with the purpose of increasing the value of its own business activities through greater attention to certain principles of ethics and good conduct.

The Ethics and Corporate Social Responsibility is, in fact, the challenge of the more enlightened companies, not only out of a sense of responsibility towards the community in which they operate and in compliance with the expectations of its internal and external stakeholders, but also for emphasize the values of the brand with a new, exclusive, recognizable character, which differs in style than its competitors. In this case, communication is combined with an industrial and commercial administration in a joint responsibility that engages everyone in SOCIETÀ ITALIANA GAS LIQUIDI SPA to operate according to goals of social responsibility.

With this work SOCIETÀ ITALIANA GAS LIQUIDI SPA presents another important moment in the construction of its own know-how to all stakeholders: the CODE OF ETHICS.

SOCIETÀ ITALIANA GAS LIQUIDI SPA aims to communicate the principles that have characterized the act from the beginning of the activity with the adoption of the Code of Ethics. These principles affect or will affect all the resources of SOCIETÀ ITALIANA GAS LIQUIDI SPA (shareholders, directors, consultants and employees) in the business management and corporate activities.

The purpose of the activity is to create a purport for the shareholders, together with the clients' satisfaction and the personal and professional development of all employees and co-workers, preserving and increasing over time the economic capital, the financial sector and in particular the human capital of SOCIETÀ ITALIANA GAS LIQUIDI SPA.

SOCIETÀ ITALIANA GAS LIQUIDI SPA also aims to consolidate and develop the confidence relationship with stakeholders, that is the categories of individuals, groups or institutions whose contribution / relationship is essential to the realization of the corporate mission.

To do this, SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to avoiding unethical behavior with its stakeholders, recognizing as "unethical" and therefore hostile to the company all the attitudes and behaviors of anyone (individual or organization) are looking to reap the benefits of someone's collaboration exploiting high places.

SOCIETÀ ITALIANA GAS LIQUIDI SPA also considers the "**good reputation**" an essential intangible resource, the maintenance of which is reflected both inside and outside of its business.

Inside enables a work organization free from cumbersome bureaucratic controls, urging shareholders, co-workers and employees to make decisions and implement them without resorting to the exercise of authority, but rather by promoting and encouraging the willingness of individuals to achieve goals of the common welfare.

Outside the Code promotes transparency with the attractiveness for investors, with the professionalism and confidentiality winning customer loyalty, recalls the correctness of the best human resources, ensures the fairness of the authority and the continuity of the relationship, reliability towards its creditors while ensuring the serenity of suppliers.

The monitoring of the Code of Ethics' implementation may be, therefore, a good reference point for "Measure" the good reputation of SOCIETÀ ITALIANA GAS LIQUIDI SPA and the correctness of the relationship held with stakeholders.

Therefore, instead of being a tool of theoretical "good behavior", SOCIETÀ ITALIANA GAS LIQUIDI SPA wants to make sure that the Code of Ethics has a practical application, an objective feedback with

reality, and therefore the possibility to be verified. With this purpose it is built according to different levels of detail:

- The **general principles** governing relations with stakeholders, which abstractly define the reference values in the activities of SOCIETÀ ITALIANA GAS LIQUIDI SPA;
- the **criteria of conduct** towards each class of stakeholders, which generate the specific guidelines and the rules that SOCIETÀ ITALIANA GAS LIQUIDI SPA co-workers are required to adhere to respect the general principles and to avoid unethical behavior;
- the **implementation mechanisms**, which describe the **control system** for compliance with the Code of Ethics and its continuous improvement.

This code, in the end, is based on an ideal of cooperation to the mutual benefit of the parties involved; SOCIETÀ ITALIANA GAS LIQUIDI SPA hopes, therefore, that each stakeholder act towards its according to principles and rules based on a similar ethical conduct.

It's important to note that since the activity in SOCIETÀ ITALIANA GAS LIQUIDI SPA extends beyond the borders of Italy, it will be necessary and appropriate that the relationship between SOCIETÀ ITALIANA GAS LIQUIDI SPA and its stakeholders will be increasingly based on compliance with the Code of Ethics regardless of whether the stakeholders belongings to the Italian territory or to another, always having in mind in its action the cultural, social and economic dissimilarities of the various regions in which it operates.

The aim of SOCIETÀ ITALIANA GAS LIQUIDI SPA will be last to act in accordance with its beliefs and those of others, looking, from time to time, for the most appropriate way to achieve its goals within the law and without any prevarication.

## 1. General principles

The general principles highlighted below are a result of the fundamental values of SOCIETÀ ITALIANA GAS LIQUIDI SPA in the conduct of the business and are the main guidelines in relations with stakeholders.

SOCIETÀ ITALIANA GAS LIQUIDI SPA intends to characterize its behavior and influence its choices with principles strongly shared by the entire organization and all resources. Therefore, those who are exposed values are strongly felt and accompany SOCIETÀ ITALIANA GAS LIQUIDI SPA ordinary and extraordinary choices.

### a) Impartiality

In the decisions that affect relations with its stakeholders (customer's choice to serve, personnel management or the organization of work, the selection and management of suppliers, relations with the surrounding community and the institutions that represent it), SOCIETÀ ITALIANA GAS LIQUIDI SPA does not discriminate based on age, sex, sexual orientation, state of health, ethnicity, nationality, political opinions and religious beliefs of his interlocutors.

### b) Honesty

As part of their professional activities, SOCIETÀ ITALIANA GAS LIQUIDI SPA employees are required to diligently comply with applicable laws, the Code of Ethics and internal regulations. In no case the pursuit of SOCIETÀ ITALIANA GAS LIQUIDI SPA interest can justify dishonest conduct.

### c) Fairness

In conducting any activities must always avoid situations where the parties involved in the transaction are, or may only appear to be, in conflict of interest. The term refers to both the case in which a shareholder / director or employee pursues an interest different from that of enterprise and the balancing of the interests of stakeholders, or "personal" advantage of business opportunities, both in the case where representatives of customers or suppliers, or public institutions act in conflict with the fiduciary duties associated with their position in their relations with SOCIETÀ ITALIANA GAS LIQUIDI SPA

### d) Confidentiality

SOCIETÀ ITALIANA GAS LIQUIDI SPA guarantees the confidentiality of information in its possession and refrain from seeking confidential, except in cases of express and informed consent, and compliance with existing laws. Every employee enters into daily contact with know-how and business sensitive and vital information for the Company: the names of the Customer and any other profile that might affect the image and corporate brand are an example of that. It follows that the same employees must scrupulously and diligently follow the obligation of confidentiality, as the spread of even only one of these information could damage the activity or the image of SOCIETÀ ITALIANA GAS LIQUIDI SPA. In addition, employees of SOCIETÀ ITALIANA GAS LIQUIDI SPA shall not use confidential information for purposes not related to the exercise of their business.

e) Transparency

The employees of SOCIETÀ ITALIANA GAS LIQUIDI SPA are required to provide complete, transparent, understandable and accurate information, so that, when establishing relationships with SOCIETÀ ITALIANA GAS LIQUIDI SPA, stakeholders are able to make autonomous decisions and aware of the interests involved, the alternatives and significant consequences. In particular, in the formulation of any contracts, SOCIETÀ ITALIANA GAS LIQUIDI SPA takes care to specify the contractor how to behave in all circumstances provided in a clear and understandable way.

f) Quality of service

SOCIETÀ ITALIANA GAS LIQUIDI SPA since the beginning of its activity has chosen to structure its organization according to the markets that SOCIETÀ ITALIANA GAS LIQUIDI SPA has decided to serve. This has encouraged the adoption of procedures and conduct business in line with customer requirements.

The structure, therefore, enhances all the efforts that are being made to ensure the highest quality of services, thanks to dedicated resources and means for each line of business.

SOCIETÀ ITALIANA GAS LIQUIDI SPA directs its activities to the satisfaction and the protection of its customers, by listening to the demands that can lead to an improvement in the quality of products and services.

g) Fair Competition

SOCIETÀ ITALIANA GAS LIQUIDI SPA intends to protect the value of fair competition by refraining from collusive behavior, predators and abuse of dominant position.

h) Evaluation of suppliers

SOCIETÀ ITALIANA GAS LIQUIDI SPA pay serious attention to the enhancement of human resources, both internal and external. In this role suppliers play an absolutely innovative partnership that is strong and integrated with the system of values.

SOCIETÀ ITALIANA GAS LIQUIDI SPA intends to gradually build a corporate identity that can be strongly attractive and inclusive, in order to create a community, formed by SOCIETÀ ITALIANA GAS LIQUIDI SPA, customers and suppliers. These, then, are for SOCIETÀ ITALIANA GAS LIQUIDI SPA an integral part of this system and are a vital part.

i) Equitable authority

In the underwriting and management of contractual relationships that involve the establishment of hierarchical relations, especially with co-workers, SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to making sure that authority is exercised fairly and correctly avoiding any abuse.

In particular, SOCIETÀ ITALIANA GAS LIQUIDI SPA guarantees that the authority does not lead to any exercise of power detrimental to the dignity and autonomy of the employee, and that the choices of work organization safeguard the value of employees.

The style of leadership, as well as being managerial, it is still marked by the recognition of the authority of the decisions and choices, so that it contributes to the mitigation of potential conflicts. Be authoritative also contributes decisively to build consensus around the decisions that are taken and to generate shared goals.

j) The centrality of human resources

The employees of SOCIETÀ ITALIANA GAS LIQUIDI SPA are an essential factor for its success. For this reason, SOCIETÀ ITALIANA GAS LIQUIDI SPA protects and promotes the value of human resources in order to improve and increase the personal and professional possessed by each employee, so that the energy and creativity of the individual finds full expression in the fulfilment of their potential.

For SOCIETÀ ITALIANA GAS LIQUIDI SPA people are an essential element for the existence of the enterprise. The value of people and their professionalism are conditions for achieving business goals.

SOCIETÀ ITALIANA GAS LIQUIDI SPA therefore intends to establish a business climate and a leadership style that put human resources in terms of implementing actions which determine the success of SOCIETÀ ITALIANA GAS LIQUIDI SPA

SOCIETÀ ITALIANA GAS LIQUIDI SPA guarantees the physical and moral integrity of its employees and working conditions which respect individual dignity and the workplace safe and healthy.

For this reason, requests or threats to induce people to act against the law and the Code of Ethics, or to engage in conduct detrimental to the moral and personal convictions and preferences of each are not tolerated.

k) Responsibility towards society and the territory

SOCIETÀ ITALIANA GAS LIQUIDI SPA is aware of the direct and indirect influence, that its activities may have on the conditions, on the economic and social development and on general welfare of the community, as well as the importance of social communities in which it operates.

In fact, all policies are aimed at maximizing the economic impact in the territory in which it operates, using where possible local craftsmen and suppliers appropriately selected also on a national basis.

l) Copyright protection

SOCIETÀ ITALIANA GAS LIQUIDI SPA pursues the goal of compliance with the rules of intellectual property and plagiarism, specifically with the rules of copyright defense.

m) Keeping accounting records

SOCIETÀ ITALIANA GAS LIQUIDI SPA demands full compliance with the laws and with current legislation on the accuracy and completeness of account books and accounting records. It is forbidden to form undisclosed or unrecorded funds for any purpose. Will be held an internal account control system capable of ensuring that recording of transactions allows the production of financial statements in accordance with accounting principles, as well as capable of taking in account all the assets of the Company.

n) Anti-Money Laundering

Should not be carried out behaviors likely to allow or facilitate the fencing, recycling or use of money, goods or utilities of illegal origin and funding activities with purposes of terrorism or subversion of democratic order.

o) Environmental

SOCIETÀ ITALIANA GAS LIQUIDI SPA pursues the goal to respect the environmental. This in the light of the fact that it is ascertained that the quality of the environmental is the peculiar character of the "quality of life", it is an essential condition of the corporate and economical development: this means that all the Company's activities must be done in compliance with the law and they don't have to compromise the biophysical balance, the ecosystems, the biodiversity, the animal, plant species or protected natural areas or subject to constraints and, at the same time, they must allow sustainable economic development.

p) Prevention of corruption

SOCIETÀ ITALIANA GAS LIQUIDI SPA , in the performance of its functions, operates in strict compliance with the regulatory provisions on the prevention and combating of corruption also through the implementation of Guidelines concerning the "*Prevention and repression of corruption*".

Each employee has to contribute with his behavior and his work to the business process of promoting integrity, legality and transparency, also supplying the Supervisory Internal Control with data an/or information of his own competence.

In order to supplement the provisions of this Code of Ethics, SOCIETA' ITALIANA GAS LIQUIDI S.P.A. has also adopted the Anti-Corruption Policy, which defines and further details the rules for the prevention and fight against corruption, as well as the values and principles of integrity and transparency, with the aim of preventing and countering the risks of unlawful practices in the conduct of business and corporate activities.

Adherence to the Anti-Corruption Policy is a fundamental requirement for all collaborators and business partners and constitutes an essential part in contractual relationships with SOCIETA' ITALIANA GAS LIQUIDI S.P.A., which undertakes to monitor compliance with the established principles, reserving the right to carry out audits and adopt appropriate measures in the event of any violation.

Anyone who becomes aware of any unlawful conduct or failure to comply with the provisions contained in the Guidelines and in the related legislation is required to provide a prompt reporting to their immediate superior or to the Supervisory Internal Control.

The aforementioned Anti-Corruption Policy is available for consultation on the website of SOCIETA' ITALIANA GAS LIQUIDI S.P.A. at the following address: <https://www.vulcanenergie.com/>.

## **2.1 Recipients of the Code of Ethics**

The recipients of the present Code of Ethics are:

- Shareholders;
- The Directors;
- The Auditors;
- Employees;
- Partners;
- All those who directly or indirectly, on a permanent or temporary basis, establish relations with SOCIETA' ITALIANA GAS LIQUIDI SPA .

SOCIETA' ITALIANA GAS LIQUIDI SPA promotes the diffusion of the Code of Ethics to ensure that all recipients adapt and conform their behavior to its content.

All the recipients will be required to comply with the principles and, for what concerns their own competences, will ensure the observance of the principles.

In particular, the respect of the rules is considered essential part of contracts' obligations of SOCIETA' ITALIANA GAS LIQUIDI SPA 's employees on the sence and for the effects of articles 2104 and following of Italian Civil Code.

The eventual breach/ violation of the principles and rules of conduct of the present Code of Ethics prejudice the trustworthy relationship with SOCIETA' ITALIANA GAS LIQUIDI SPA which would promote the most suitable disciplinary actions e the request for damages. For the subordinatives workers remain the respect of the procedures established by article 7 law n.300 of 20<sup>th</sup> of May 1970 (so called Statute of Workers), of the collective contracts applicable, of the company's bylaw and of the penalties'Regulation adopted by SOCIETA' ITALIANA GAS LIQUIDI SPA.

## **3.1 Standards of conduct in relations with shareholders**

SOCIETA' ITALIANA GAS LIQUIDI SPA adopts a system of governance that complies with the provisions of Italian law and is oriented:

- to maximize value for the property
- balancing the interests of all corporate components
- the quality of service to customers
- respect for and enhancement of suppliers
- respect for and promotion of human resources
- the control of business risks

- transparency towards the market

The management of SOCIETÀ ITALIANA GAS LIQUIDI SPA, first-hand, the auditors, and where applicable, the employees and external co-workers are required to comply to Shareholders and creditors of SOCIETÀ ITALIANA GAS LIQUIDI SPA:

- a) a true and fair information on the economic situation and financial position;
- b) a correct, transparent and collaborative manner, in compliance with the law and internal procedures, with particular attention to all procedures that allow the end of the year to establish the budget or any interim report;
- c) the behavior to verify the adequacy and accuracy of the procedures put in place to protect the actual existence of the stated share capital especially when extraordinary transactions or distribute profits or reserves are perfected or it was decided to dispose of part of the estate or dismiss it all as well as to ensure uniform treatment of creditors and any guarantees issued;
- d) a conduct which, in the autonomy of their management decisions, is marked by the proportionality of the actions taken regarding to economic and financial capacity;
- e) a pattern of conduct to prevent any fraudulent activity or unfair competition;
- f) a conduct of full cooperation with all the control authorities provided by law;
- g) a conduct that provides for tracking of each economical transaction of the Company and, above all, any transfer of money or other benefits in order to eliminate forms of recycling;
- h) any relevant economic, financial or patrimonial transaction should have an adequately recorded and for each record there must be an adequate supporting documentation and archiving so that, at all times, the operation can be verified, motivated and documented to the performance of any control operation.

#### **- Shareholders' Meeting**

The General Assembly is the prime time for the establishment of a fruitful dialogue between members. To this end:

- has secured the regular attendance of directors at meetings;
- will be adopted specific regulations to ensure the orderly and effective conduct of business, while respecting the fundamental right of each shareholder to request clarification on the various topics under discussion, to express their opinion and make proposals;
- it is guaranteed that all assets and information is made available in advance by the shareholders.

Are reserved to the competence of members:

- the appointment of directors
- the determination of the remuneration of the directors and auditors
- amendment of the memorandum and articles of association
- the decision to carry out operations which involve changes to the corporate
- the dissolution of the Company
- exclusion of a partner
- the approval of the budget and the distribution of profits

#### **- CDA/Administrative or Management Body**

The Board of Directors is vested with the broadest powers for the ordinary and extraordinary management of the Company and is empowered to take all actions that it deems necessary for the achievement of the company.

By virtue of this, the Board of Directors:

- grants and revokes the powers of the Chief Executive Officer, defining the limits and conditions of exercise;
- receives information from the CEO and the other executive functions on overall performance and the outlook of the most significant transactions;



- examines and proposes to the General Meeting the strategic, industrial and financial plans;
- elect from among its members a Chairman and, if applicable, a Vice President, unless they have not already done so shareholders at the time of the appointment of the Board.

#### **- Non-executive and independent Directors**

The Board of Directors also consists of non-executive members (who are not delegated operational and / or management functions in the Company), such as to ensure, by number and authority, that their judgment may have a significant impact on board decisions.

Non-executive directors bring their specific expertise to board discussions, with the aim of facilitating the examination of topics in discussion from different perspectives, for the consequent adoption of resolutions meditate, that are in line with the corporate interest.

The directors are required to:

- to pay all an active role in their appointment, allowing the Company to benefit from their expertise;
- to participate in a continuous manner in the meetings of the Board;
- to report any situation in which they hold an interest, or on behalf of third parties, which involves them, abstaining in such situations from participating in the decision-making of the Board;
- to maintain the confidentiality of documents and information acquired in the performance of their duties and to comply with the procedure for its disclosure;
- to always give precedence to the interest of SOCIETÀ ITALIANA GAS LIQUIDI SPA over the particular individual members.

### **3.2 Standards of conduct in relations with co-workers, including the principles pertaining to the protection of health and safety at work**

#### **• Selection of staff**

The evaluation of personnel is carried on the correspondence between the profiles of the candidates, moral and professional, and those expected for your business needs, in respect of equal opportunities.

The required information is used for checking the unique aspects of the job profile and aptitude sought in respect for private and opinions of the candidate.

Each apical who is interested in or in taking part to the employment shall, within the limits of available information, adopt appropriate measures to avoid favouritism, nepotism or cronyism in the selection and employment (for example, preventing the selector is bound by ties of kinship with the candidate).

#### **• Creation of employment**

The staff is employed with a regular employment contract and is not tolerated in any form of illegal labour. The establishment of the relationship of each employee receives accurate information regarding:

- Characteristics of the function and duties to perform
- Regulations and wage, as regulated by the national labour
- Rules and procedures to be adopted in order to avoid the possible risks to health associated with work
- The training course, designed to enhance the professional person and the job

This information is explained to the employee in such a way that the acceptance of the assignment is based on a real understanding of the terms of employment.

#### **• Management of staff**

SOCIETÀ ITALIANA GAS LIQUIDI SPA avoids any form of discrimination against its employees.

During the processes of management and staff development, as well as in the selection phase, the decisions taken are based on the correspondence between expected and actual profiles of the employees and / or on considerations of merit (for example, allocation of incentives based on results achieved).

Access to roles and positions is also established in consideration of the skills and capabilities; in addition, consistent with the general efficiency, are favoured flexible work arrangements that facilitate the management of maternity and overall child care.

The responsible fully use and exploit all the professionals participating in the structure by the activation of the levers available to promote its development and growth.

To do this, communication is particularly important by the managers of the strengths and weaknesses of the employee, so that the latter will aim to improve its skills through targeted training.

SOCIETÀ ITALIANA GAS LIQUIDI SPA offers all employees information and training tools, with the aim to preserve and enhance the specific skills of the personnel.

Each manager is required to optimize the working time of employees requesting services consistent with the exercise of their duties and with the plans of work organization.

Is an abuse of position of authority require, as a necessary act to its superior, performance, personal favours or any conduct that violates this Code of Ethics.

It secured the involvement of staff in carrying out the work, also providing moments of participation in discussions and decisions to the achievement of personal and company goals.

The employee must take part in such a spirit of cooperation and independence of judgment.

Listening to the various points of view, consistent with business needs, enables the administrator to make the final decisions; the employee must, however, always contribute to the implementation of the established activities.

- Health and safety

The aim of SOCIETÀ ITALIANA GAS LIQUIDI SPA is to protect its human resources and financial items, constantly seeking SOCIETÀ ITALIANA GAS LIQUIDI SPA the synergies needed not only within the company but also with suppliers, companies and customers involved in its activities.

SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed thus to promote and consolidate a culture of safety, promoting risk awareness and promoting responsible behavior by all employees; also works to preserve, especially with preventive actions, the health and safety of workers, and the interests of other stakeholders, in compliance with applicable laws and in accordance with the highest international standards.

SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to minimizing the risk of accidents and occupational diseases related to business activities, beginning with the most serious one. This is one fundamental purpose of SOCIETÀ ITALIANA GAS LIQUIDI SPA, which can never be overlooked.

To this end, SOCIETÀ ITALIANA GAS LIQUIDI SPA has adopted an Occupational Health and Safety Management System certified in accordance with the UNI EN ISO 45001:2018 standard, promoting a corporate culture based on risk prevention, continuous training, and the ongoing improvement of working conditions.

In detail, SOCIETÀ ITALIANA GAS LIQUIDI SPA, starting from the property and by senior management, is committed to:

- a) plan and conduct the business also for the sake of ensuring safety in the workplace, reduce and prevent accidents, injuries and occupational diseases;
- b) assess the occupational risks for each job, task, job, local, rural plant, etc. and define the necessary preventive measures to protect anyone who might be at risk and the environment; also perform this activity before making decisions about business changes of any kind and before accepting new orders;
- c) take into account the safety aspects for contracts and the work entrusted to others, and to ensure, as far as is in his power, that they are managed in order to ensure security for its own staff, others, for the third and the environment;
- d) determine the functions, competences, powers and responsibilities to verify, evaluate, manage and control risks, and to ensure compliance of the provisions, so that the entire corporate structure involved, according to their role and conduct of its daily activities to the achievement of safety targets;



- e) ensure that in SOCIETÀ ITALIANA GAS LIQUIDI SPA cope with quickly and effectively to any new security requirements that emerge during work activities and to preventing the execution of non- submitted activities in advance to the Risk Assessment;
- f) require compliance with all applicable laws and company regulations on safety;
- g) inform, educate, and, if necessary, to train all personnel, initially and periodically, beginning with the managers, to enable it to carry out their tasks safely and to assume its responsibilities in the field of occupational safety, with specific reference to the task being performed;
- h) raise employee awareness about security issues, engage them, consult and inform them of developments in corporate security, including through regular meetings and regularly contacting their Safety Representative;
- i) give itself at least annual goals for safety, and to check them frequently, to continuously improve prevention;
- j) to allocate sufficient staff and resources to implement the above points;
- k) each worker and employee is required to comply with the company's regulations on health and safety at work and cooperate to reduce occupational hazards;
- l) any employee and the employee is required to interrupt their work, announcing it as soon as possible to the top and to the RLS, when it is done in such a way as expected with serious risks to health and safety, if the break does not introduce greater risks.

• Privacy Policy according to the EU Regulation n.2016/679 and Legislative Decree n. 196/2003 and following amendments

The privacy of the employee is protected by adopting standards that specify the information that the company requires the employee and the methods of treatment and storage.

Any investigation into the ideas, preferences personal tastes and, in general, the private lives of employees are ruled out. These standards also prohibit, except in the cases provided by law, the disclosure / dissemination of personal information without the prior consent of, and establish rules for the control, by each employee, the rules for the protection of privacy.

• Duties of employees

The employee must act fairly, ensuring the required performance and in compliance with the obligations undertaken in the employment contract and the provisions of the Code of Ethics; it is required to report through the appropriate channels any violation of the rules of conduct established by internal procedures. The employee must be aware of and implement company policies regarding information security to ensure data integrity, confidentiality and availability. He is required to produce his documents using a clear, objective and exhaustive language, allowing any checks from colleagues, managers or external parties authorized to do so.

All employees of SOCIETÀ ITALIANA GAS LIQUIDI SPA must avoid situations in which they may give rise to conflicts of interest and not to take advantage of business opportunities known during the course of their duties.

Each employee is required to work diligently to protect corporate assets through responsible behavior and in line with the operating procedures to regulate their use, accurately documenting their use.

Each employee is responsible for protecting the resources entrusted to him and has the duty to promptly inform the Management of any threats or harmful events for SOCIETÀ ITALIANA GAS LIQUIDI SPA.

With regard to applications, each employee is required:

- To comply scrupulously with the provisions of the corporate security policies, in order not to compromise the functionality and security of information systems;
- Do not send e-mail messages threatening or insulting, compounds with low-level language or inappropriate comments that might offend the person and / or damage the corporate image;
- Do not surf on Internet sites that are not closely related to the business and specifically to the task carried out in each case to refrain from visiting websites that present in them indecent and

offensive contents to common sense of decency, and to carry out any operation in violation of laws and regulations.

- Conflict of interest

The staff is required to avoid all situations and all activities in which a conflict with SOCIETA' ITALIANA GAS LIQUIDI SPA's interests may concretely arise or that may interfere with their ability to make decisions impartially in the best interests of the Company and in full compliance with the Code of Ethics.

The staff must also refrain from taking personal advantage from acts of disposal of corporate assets or business opportunities of which they become aware during the performance of their duties.

By way of example, but not limited to, the following situations leads to conflicts of interest:

- use of ranking or use of information acquired during work so that a conflict between personal interests and SOCIETA' ITALIANA GAS LIQUIDI SPA interests may arise;
- carry out work activities of any kind, in favour of customers, suppliers, competitors, government agencies, institutions and organizations of public interest;
- accept or offer money, favours or services from individuals or companies that are or intend to enter into business relationships with SOCIETA' ITALIANA GAS LIQUIDI SPA;
- hold public office entities that may have a relationship with SOCIETA' ITALIANA GAS LIQUIDI SPA, so as to create the conditions for a potential conflict of interest.

Employees with senior positions, called on to take decisions in business when there is clear conflict between personal interests and those of the Company, shall:

- communicate the existence and nature of the conflict to the Supervisory Board and to the direct supervisor;
- refrain from exercising their decision-making role and delegate this role to other subjects appointed by corporate organization;
- however, in the event that the aforementioned abstention / delegation is not possible, involve other stakeholders in the decision-making process in order to give greater transparency to the process itself.

In order to properly prevent and manage conflicts of interest, even potentially harmful, at the time of assignment or at the time of commencement of an employment relationship, the Company requires its directors, employees and partners to sign a statement that excludes the presence of a conflict of interest between the individual and SOCIETA' ITALIANA GAS LIQUIDI SPA, or, if there is a conflict, that reveals the nature of it.

- Protection of assets

The staff is committed to preserving the properties, facilities and equipment of the Company and to use them in a responsible manner. It is also forbidden to use facilities, materials and / or supplies belonging to SOCIETA' ITALIANA GAS LIQUIDI SPA for personal gain.

### **3.3 Standards of conduct in relations with customers**

SOCIETA' ITALIANA GAS LIQUIDI SPA pursues its business success on markets by offering quality services at competitive prices, in compliance with all the rules protecting fair competition.

SOCIETA' ITALIANA GAS LIQUIDI SPA acknowledges that the esteem of those requesting services is of primary importance for its business success.

- Style of employees' behavior

The behavior of SOCIETA' ITALIANA GAS LIQUIDI SPA to customers is based on availability, the highest professionalism, respect and courtesy, in a collaborative relationship long-lasting and highly professional

- Degree of customer satisfaction

- SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to ensuring adequate standards of quality of the services offered on the basis of predefined levels and to periodically monitor the quality perceived by the customer,
- SOCIETÀ ITALIANA GAS LIQUIDI SPA undertakes to comply with the terms of punctuality contractual arrangements with the customer, in order to achieve full mutual satisfaction,
- SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to constantly monitor the quality of services offered by external partners and suppliers.

### **3.4 Standards of conduct in relations with suppliers**

For SOCIETÀ ITALIANA GAS LIQUIDI SPA suppliers are a vital element for the growth and development of the entire organization. For this reason, SOCIETÀ ITALIANA GAS LIQUIDI SPA part suppliers within the human capital of SOCIETÀ ITALIANA GAS LIQUIDI SPA and intends to pursue a policy of continuous improvement of the quality of services offered by selected partners, contributing to the raising of their ethical standards, and promoting, even with own resources, the growth of professional skills.

#### **• Choice of supplier**

Purchasing procedures are designed to obtain the maximum competitive advantage for SOCIETÀ ITALIANA GAS LIQUIDI SPA and the granting of equal opportunities for all suppliers; the search for maximum competitive advantage must guarantee the satisfaction of the supplier, in order to avoid the abuse of a position of strength such as to weaken the supplier also from the economic point of view. They are also based on pre-contractual and contractual held with a view to an indispensable and mutual loyalty, transparency and collaboration.

In particular, employees of SOCIETÀ ITALIANA GAS LIQUIDI SPA assigned to these processes are required:

- Not to allow somebody who has the requested requirements for the opportunity to compete for a contract, adopting objective and documented criteria on the choice of shortlisted;
- To ensure sufficient competition in every race.

SOCIETÀ ITALIANA GAS LIQUIDI SPA also provides a list of suppliers whose qualification criteria constitute a barrier to access. For SOCIETÀ ITALIANA GAS LIQUIDI SPA the reference requirements are:

- Appropriately documented availability of resources, including financial, organizational structures, capabilities and resources, know-how, etc.;
- The existence and effective implementation, in cases where the provisions SOCIETÀ ITALIANA GAS LIQUIDI SPA provide for it, of adequate quality systems.

SOCIETÀ ITALIANA GAS LIQUIDI SPA aims of enlargement of the supplier base, operating in view of the fulfilment of the criteria for access by the largest possible number of suppliers.

#### **• Integrity and independence of the relationships**

Within SOCIETÀ ITALIANA GAS LIQUIDI SPA relations with suppliers are governed by common principles and are subject to constant monitoring by SOCIETÀ ITALIANA GAS LIQUIDI SPA .

The signing of a contract with a supplier must always be based on extreme clarity and transparency and avoid all forms of addiction.

#### **• Dominant Position**

SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to not abuse, other than normal commercial relations, of eventual dominant positions.

### **3.5 Standards of conduct in relation with the Community, including the principles pertaining to the enforcement of environmental legislation**

Relations with the Community mainly concern three areas:

- **Environmental Policy**

The employees of SOCIETÀ ITALIANA GAS LIQUIDI SPA, in scope of their jobs, take part in risk prevention, environmental protection, and health and safety protection for themselves, their colleagues, and third parties.

Environmental crimes appear due to alleged danger, enough to pay their status the failure to comply with the laws, not turn out necessary the effective achievement of environmental damage.

The crimes set out in Article 25 *undecies* of the Decree, with few exceptions, are fines characterized, subjectively, as much wilful misconduct as gross negligence.

To any assumption of administrative offense, the pecuniary fine is applied, divided in proportion to the gravity of offenses and quantified with the quota system (Article 11 of the Decree).

For some crimes, in addition to pecuniary fines, are provided disqualifying penalties (Article 9, paragraph 2 of the Decree). Among these hypotheses the crime of illegal dumping and the discharge of industrial wastewater containing hazardous substances are included.

In order to prevent the risk of commission of the offenses and the direct responsibility of SOCIETÀ ITALIANA GAS LIQUIDI SPA, it is necessary to adopt safeguards to allow adequate monitoring of environmental risk and therefore a coordinated system of procedures for the management and allocation of tasks and responsibilities.

The subjects of the Model 231/ 01 which contribute in various ways and with different responsibilities in the management of the processes listed above must:

- Comply with the provisions of the Code of Conduct;
- Comply with the provisions of laws and regulations;
- To operate within the powers of representation and signature, the proxies and the powers of attorney empowered;
- Comply with the provisions established by the reference procedures;
- Comply with the instructions given by superiors;
- Report to the O.D.V. any actions taken in violation of the provisions of the Model pursuant to Legislative Decree 231/ 01.

- **Relations with interest groups**

SOCIETÀ ITALIANA GAS LIQUIDI SPA believes that dialogue with associations is of strategic importance for the proper development of its business; therefore, establishes a stable channel of communication with the associations representing stakeholders in order to cooperate in accordance with their mutual interests, to present their positions and prevent possible conflicts.

- **Relations with political parties, movements, committees and political organizations and trade unions**

Each report of SOCIETÀ ITALIANA GAS LIQUIDI SPA with the parties, movements, committees and political organizations and trade unions must be based on transparency and maintained exclusively by the corporate functions formally delegated.

Outside of Institutional prohibits the giving of any benefit or contribution, direct or indirect, to officials or candidates.

- **Relations with the media**

Relations with the media can be entertained only in order to disseminate the projects and achievements of SOCIETÀ ITALIANA GAS LIQUIDI SPA as well as to disseminate the qualifying aspects of politics and finally Company to safeguard the image of the same SOCIETÀ ITALIANA GAS LIQUIDI SPA .

Each interview or communication shall be issued by the corporate functions formally delegated.

- **Contributions and sponsorships**

Sponsorship activities, which may relate to social environment, sports, entertainment and arts issues, are intended only for events that offer a guarantee of quality and for which SOCIETA' ITALIANA GAS LIQUIDI SPA can collaborate in the design, so to guarantee originality and effectiveness.

In any case, in the selection of proposals to be accepted, SOCIETA' ITALIANA GAS LIQUIDI SPA pays particular attention to any possible conflict of interest of a personal or business use.

SOCIETA' ITALIANA GAS LIQUIDI SPA is also engaged in outside donations, so as to contribute directly to the support of social causes of a different nature and relevance.

### **3.6 Rules of conduct with the Public Administration**

#### **• Institutional relations**

The relations with the PA, with the other institutions and the supervisory authorities must be based on the principle of transparency. SOCIETA' ITALIANA GAS LIQUIDI SPA is committed to maintain relations with these subjects exclusively with the management and staff at this formally delegate.

In this view agrees to establish and disseminate a comprehensive system of powers that allow to single out the corporate organizational chart Subjects who are authorized to represent SOCIETA' ITALIANA GAS LIQUIDI SPA The management, staff, employees and any other person acting on behalf of SOCIETA' ITALIANA GAS LIQUIDI SPA mandatorily must refrain from defending the market position of the Company or engage in behavior that could lead to get this benefits or contracts of any kind promising gifts of money or other benefits. SOCIETA' ITALIANA GAS LIQUIDI SPA is committed to affirm the ban at every level for each employee or not to intervene in the sphere of public authorities or in the political and maintain in all circumstances independent behavior.

The Company undertakes that the above is not circumvented surreptitiously through gifts, courtesies, consultancy, aid of any kind of sponsorship, advertising or personal tasks.

The Board of Directors and employees are prohibited from accepting or require sums of money, usefulness of any kind, forms of hospitality or gratuity for the performance of acts contrary or conform to their office, although in the interest of SOCIETA' ITALIANA GAS LIQUIDI SPA same.

In particular, it is forbidden to promise or grant disbursements utility for purposes other than those institutional promise or favouritism in the recruitment of personnel, selection of suppliers of goods and services, in the communication of information or documents; produce documents and / or data false or altered information or omit due information, in that in order to receive grants or loans or grants by the State, other agencies or the European Union; earmark contributions, loans or grants for purposes other than those provided for obtaining the same; accessed in an unauthorized manner to the information systems of public administration in order to obtain or alter information for the benefit of the Company.

SOCIETA' ITALIANA GAS LIQUIDI SPA is also committed to:

- Establish, without any kind of discrimination, stable channels of communication with all institutional stakeholders at local, regional and national levels;
- Represent the interests and positions of the Company in a transparent, rigorous and consistent manner, avoiding collusive behavior.

### **3.7 Standards of conduct in relations with the judiciary**

The goal of this part is to make sure that the Model, to the extent that they are involved in activities in areas at risk, comply with code of conduct in accordance with the requirements of the regulatory system and sanctions, in order to prevent and encumber the occurrence of crimes.

The reports with public officials, with the judiciary, with the public supervisory authorities and other independent authorities related to the Company must be undertaken and managed in full compliance with applicable laws and with the principles stated in the Code and internal protocols, so as not to compromise the integrity and reputation of the parties involved.

The penalty regime applicable to the Company is of a pecuniary nature for the crime under Article 377 bis of the Italian Criminal Code.

This Protocol identifies and adjusts the operating procedures to be followed in cases where the Recipients, covering the quality of defendants or co-defendants in proceedings connected or connected, are called upon to make statements before the Judicial Authority.

The subjects who, as defendants or co-defendants in proceedings connected or connected, are called upon to make statements on the Judicial Authority must:

- To ensure that statements are carried out in full compliance with laws, regulations and principles of honesty and fairness;
- Ensure that the statements made to contain only true information.

The subjects identified in the Special Part are forbidden from:

- Entertaining, if this is possible, relationships inherent with their professional activities with public officials without ensuring the traceability of meetings or conversations occurring;
- Exert pressure of any kind (violence, threats, offensive or promises of money or other benefits), on the subject called to make statements before the Judicial Authority, in order to induce him not to make statements or to make false statements;
- Take any conduct which has the purpose, or even only the effect of impeding the exercise of the functions of the Judicial;
- Take any conduct which has the purpose, or even the effect of helping someone to circumvent or evade the investigations of the Judicial searches.

### **3.8 Standards of conduct in the use of computer and telecommunications systems**

The law of 18 March 2008, n. 48 has included the Article 24 - bis into the Decree, which provides for new forms of administrative liability in the event of crimes committed through the Internet or other computer networks and extends the scope of computer crime including all crimes committed in any way by means of a computer system, even if where the evidence of the crime is in electronic form and also in cases where the taxable person is not a public administration.

Following the introduction of computer crimes, the Company must conform their behavior and organization in order to:

- To ensure the protection of information assets;
- Ensure the correct use of technological resources;
- Have evidence that the effectiveness of the implemented controls is efficacious.

Preventive and suitable security and controls measures will have to be prepared to prevent potential crimes with the help of technological tools.

In the absence of a legislative definition the case has tried to provide a general definition of "information system". The definition is basically applied to all the incriminating circumstances that refers to it, and by virtue of which must be deemed such any equipment, more or less complex, "designed to perform any useful function to humans through the use, even partial, of computer technology." These are characterized by the presence of three functional aspects: a) the recording or storage, "by means of electronic pulses and on adequate supports, of data represented by the symbols (bits) (numeric code) in different combinations"; b) "automatic processing" by the machine data so recorded or stored; c) the organization of such data "in a way which allows them to express a particular meaning for user" (utility).

It is a definition focused on the transition from "data" to "information"; in the sense that the function of recording - electronic storage of data to which "elementary representations of a fact" is accompanied by the complementary function of processing - logical organization of these data sets more or less extended constituents' "information".

Many computer systems connected stably between them in order to allow the transmission - the communication in the distance of collected information constitute a "telematics system".

In this case the element that allows to recognize a system "telematics" in place of a mere device for remote transmission of signals is given by the fact that to be connected to each other are two or more systems "computer": typical is the case of e-mail systems or connections via remote terminals.



## 4. Principles of Corporate Social Responsibility

### 4.1 Responsibility to be accountable (accountability)

For the aim of a correct adhesion to Corporate Social Responsibility Principles, SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to so called “responsibility to be accountable”.

Specifically, the company will bear in mind of its impact on society, the economy and the environment. The management assumes the obligation to respond to its own choices towards who have stakes in company's organization, while the organization assume the obligation to respond to legal authorities about the respect of laws and regulations. Furthermore, the responsibility to be accountable implies that the organization answer to the subject involved in its decisions and activities, as well as the society in general, with different ways and levels, based on the impact nature of its activity on society and the environment, in relation to single circumstances.

In addition, SOCIETÀ ITALIANA GAS LIQUIDI SPA takes on the burden of the responsibility from unfair actions, by adopting adequate measures to resolve and take over actions to avoid the reiteration.

The organization of SOCIETÀ ITALIANA GAS LIQUIDI SPA must account for

- the impact of its own decisions and activities on society, the environment and the economy, especially for what concern particularly negative consequences;
- the actions undertaken with the aim to avoid the reiteration of negative unforeseeable and involuntary impacts.

### 4.2 Transparency

SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to being transparent in its own decisions and in its own activities which impact society and the environment.

A transparent organization, indeed, should communicate in a clear, accurate and complete way, also the company should communicate at a reasonable and sufficient level its own policies, decisions and activities, as well as, information about the impact on society and the environment, doesn't matter if known or likely.

This information will be immediately available, directly accessible and comprehensible to those who have been influenced in a significant manner or could have been influenced, by the organization. SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to making timely information based on concrete facts, in a clear and objective way in order to allow the stakeholder to assess accurately the impact on their own interest of company's decisions and activities.

SOCIETÀ ITALIANA GAS LIQUIDI SPA undertakes the commitment to be transparent regarding:

- the aim, the nature and the location of its own activities;
- the identity of those who have an interest in controlling its activities;
- the way of taking, actuating and re-examine the decisions, including the definition of roles, responsibilities, of the position with responsibility to account for, and the positions of authority for the different functions of the organization;
- the rules and criteria according to which the organization assess its service about corporate social responsibility;
- its service concerning specific, pertinent and significative aspects of corporate social responsibility;
- the sources, amount and manner of use of its funds;
- the known and likely impacts of its decisions and activities on its stakeholders, society, economy and environment;
- its stakeholders and the criteria and procedures used to identify, select and involve them.

### 4.3 Ethical Conduct

SOCIETÀ ITALIANA GAS LIQUIDI SPA chooses to adopt an ethical behaviour, based on values such as honesty, equity and integrity. The adoption of these values implies relevant attention to the respect of persons, animals and the environment, as well as the assumption of commitment to face the impact of its activities and decisions on stakeholders' interests.

For these reasons, SOCIETÀ ITALIANA GAS LIQUIDI SPA chooses to promote actively ethical conduct by:

- identifying e declaring its principles and fundamental values;
- developing and using structures of government capable of promoting ethical conduct within the organization, in its decision-making process and its interactions with others;
- identifying, adopting and applying rules of ethical conduct appropriate regarding its goals and activities;
- encouraging and promoting the rules of ethical conduct considered appropriate from its governance structure, its employees, suppliers, contractors, and, if appropriate, from owners, managers and, in particular, from everybody who has the opportunity to influence in a significant way the values, the culture, the integrity, the strategy and the operativity of the organization and of the persons who operate on its behalf;
- preventing or eliminating, inside its organisational structure, conflict of interest with could, in contrary cases, bring non-ethical conducts;
- establishing and maintaining active mechanism of supervision and control for the monitoring, support and enforcing ethical conduct;
- establishing and maintaining active mechanisms to enhance the reporting of non-ethical conducts without dread of negative consequences; recognizing and treating in adequate way the single territorial and concrete situation, where laws and local regulations don't exist or are in conflict with ethical conduct;
- respecting the wellness of animals, in case the company's activity has to do with their life or existence, moreover ensuring the provision of good conditions of care, farming, production, transport and animal use.

#### **4.4 Respect for stakeholders' interests.**

With this code of ethics, SOCIETÀ ITALIANA GAS LIQUIDI SPA assumes a commitment to respect, take into consideration and respond to the interests of its stakeholders.

Indeed, it must be remembered that although the objectives of a business or organization are generally limited to the interests of its owners, members, customers or affiliates, frequently other individuals or groups of individuals may have rights, demands or specific interests that deserve to be taken into consideration. Precisely such individuals or groups of individuals, collectively understood, represent the stakeholders of the organization or enterprise.

In order to respect these interests, SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to:

- identify its stakeholders;
- recognize and have due regard for the interests and rights of its stakeholders, as well as respond to the concerns expressed by them;
- recognize that some stakeholders may significantly affect the organization's activities;
- evaluate and take into account the relative ability of stakeholders to make contact with, engage and influence the organization;
- take into account the relationship between the interests of stakeholders and the broader expectations of society and sustainable development, as well as the nature of the stakeholders' relationship with the organization;
- take into account the opinions of stakeholders whose interests are frequently affected by decisions or activities of the company, even though they do not exercise a formal role in the governance of the organization or without being aware of these interests.

#### **4.5 Repudiation of All Discrimination**

In decisions affecting relations with its stakeholders (choice of customers, relations with capital holders, personnel management and labour organization, selection and management of suppliers, relations with

the surrounding community and the institutions that represent it), SOCIETÀ ITALIANA GAS LIQUIDI SPA avoids all discrimination on the basis of age, gender, sexuality, health status, race, nationality, political opinions and religious beliefs, etc.

#### **4.6 Respect for the principle of legality**

SOCIETÀ ITALIANA GAS LIQUIDI SPA, with this Code of Ethics, accepts the obligation to respect the principle of legality, recognizing the supremacy of law and the principle that no individual or organization is placed above the law.

The principle of legality, in fact, stands in contrast to the arbitrary exercise of power, determining for effect the need for both laws and regulations to be written, disseminated to the public, and enforced impartially according to established procedures.

This principle is also framed in the context of social responsibility, implying the necessary compliance by the member company with all applicable laws and regulations. Therefore, SOCIETÀ ITALIANA GAS LIQUIDI SPA endeavours to know all laws and regulations applicable to it, so that it can inform those within the organization who are called upon to observe and implement such measures of its obligations.

SOCIETÀ ITALIANA GAS LIQUIDI SPA undertakes to:

- comply with all legal requirements applicable to it;
- ensure that its relations and activities comply with the current legislative framework;
- keep up to date with all legal obligations;
- periodically review compliance with all applicable laws and regulations.

#### **4.7 Compliance with international norms of behaviour**

Given its commitment to the principle of legality, SOCIETÀ ITALIANA GAS LIQUIDI SPA chooses to also adapt its activities to international standards of conduct:

- in cases where the law or its implementation methods do not provide adequate environmental and social guarantees;
- in countries where the national law or its implementation methods
- appear to be in conflict with international norms of behaviour and the failure to comply with such norms could have significant consequences, reviewing in that case the nature of its relations and activities within that area;
- considering the desirability of identifying legitimate channels of communication to attempt to influence additional relevant organizations and authorities to remedy situations of conflict that may arise between local law and international norms of behaviour;
- avoiding being complicit in activities of other companies or organizations that conflict with or are inconsistent with international norms of behaviour.

#### **4.8 Respect for Human Rights**

SOCIETÀ ITALIANA GAS LIQUIDI SPA respects, while carrying out its activities, human rights and recognizes, as well, their importance and universality.

To this end, it has chosen to:

- respect and, where possible, promote the rights defined in the International Charter of Human Rights;
- respect the universality of these rights, so that they are applicable in an unfailing way in all countries, cultures and situations;
- adopt measures directed to the respect of human rights even in those situations where they are not protected, avoiding in any way taking advantage of this situation of diminished protection;
- adhere to international standards of conduct when the law or its implementation methods do not provide adequate protection of human rights.

#### **4.9 Respect for gender equality and prohibition of discrimination**

SOCIETÀ ITALIANA GAS LIQUIDI SPA, with a view to openness and inclusion as its founding values, promotes the enhancement of diversity and the contrast of gender stereotypes and violence and to this end is committed to the removal of any barrier, including cultural barriers, which constitutes an impediment to women's access to the world of work, compressing the possibility of growth and comparison on equal terms with men.

Likewise, SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to:

- respect the principles of parity and equality present in the Constitution of the Italian Republic and any similar underlying legislation up to and including this Code of Ethics;
- adopt internal policies aimed at fostering women's employment and preserving it over time by favouring the development of projects of a professional and personal nature of the female worker;
- ensure that all personnel receive adequate training and information on the subject of respect for diversity, inclusiveness and equal opportunities;
- adopt personnel evaluation and selection policies based on principles of equality, meritocracy and equal opportunities;
- ensure that employees are treated in a manner consistent with their ability to meet the requirements of their assigned role and task, avoiding all forms of discrimination on the basis of gender, race, sexual orientation, social and personal position, physical and health condition, disability, age, nationality, religion, union membership or political and/or personal convictions;
- - prohibit any act, covenant or behaviour that produces a prejudicial effect by discriminating against male or female workers based of their sex. The prohibition also has an effect concerning "indirect" discrimination, i.e., when a neutral provision, practice, act, covenant or conduct puts or is likely to put workers of a particular sex at a particular disadvantage compared with workers of the other sex;
- to remove, within the limits of its possibilities, any obstacle to concrete equality between men and women within the work environment by ensuring, to this end, equal opportunities in access to work, equal pay, equal access to career and training opportunities and the implementation and awareness of the issue of paternity leave in line with the best European policies;
- promote welfare policies to support family caregivers in a way that fosters work-life balance;
- pay the utmost attention to avoiding stereotypes in promotional, marketing and communication activities, conversely promoting the visibility of women's contribution to the world of work;
- disseminate the culture of equal opportunities outside the company's borders as well, involving stakeholders and promoting the principles of equality and inclusion.

#### **4.10 Prohibition of Violence and Harassment in the Workplace (ILO Conv. 190)**

SOCIETÀ ITALIANA GAS LIQUIDI SPA rejects in express terms any behaviour that constitutes physical or psychological violence, coercion, harassment (including harassment of a sexual nature however carried out), bullying or attitudes in any way attributable to mobbing and harassment practices. In line with the provisions of this Code of Ethics, SOCIETÀ ITALIANA GAS LIQUIDI SPA prohibits without exception all forms of violence and harassment at work within the Company. Therefore, SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to:

- promote a corporate culture based on respect, professionalism, non-discrimination and equal opportunities;
- prohibit the commission of acts of violence or harassment at work, against any person within the Company, workers, trainees, apprentices, and, in general, any other person who comes into contact with the Company or third parties in the performance of their work activities;
- to promote a work environment free of violence and harassment, whereby everyone has a responsibility to work together to create a work environment marked by respect, to support as

much as possible those who report conduct or incidents of violence and harassment, and to cooperate in related investigations;

- ensure the provision of appropriate reporting channels for the timely handling of reported situations and the confidentiality of reports;
- oversee compliance with these principles and to take measures to prevent, identify and report potential violations;
- prohibit the commission of any act of retaliation or victimization against persons who have reported, persons who have been subjected to violence or harassment, witnesses or informants;
- ensure the adoption of appropriate measures against those who have committed violence or harassment, aimed at ensuring the interruption of the conduct and the application of disciplinary sanctions, in addition to any contractual remedies that may be applicable, including suspension, termination of the contract, prohibition from doing business with SOCIETÀ ITALIANA GAS LIQUIDI SPA and claims for damages. All measures and actions will be taken with the protection of the harassed person in mind.

#### **4.11 Prohibition of child labor (ILO Conv. 138)**

SOCIETÀ ITALIANA GAS LIQUIDI SPA is committed to operating in production or distribution contexts that comply with ILO Conventions with particular reference to child labour, in the form of slavery or in environmental conditions that may compromise health, safety or morality. Respects local regulations and customs. Rejects goods and services from such suppliers.

SOCIETÀ ITALIANA GAS LIQUIDI S.P.A. takes action to ensure that the ILO principles prohibiting forced or compulsory labor and any form of discrimination based on race, religion, gender, political opinion, descent, or social origin are upheld.

#### **4.12 Prohibition of Forced Labor (ILO Conv. 29 and 105) and Non-Discrimination in Employment (ILO Conv. 111)**

SOCIETÀ ITALIANA GAS LIQUIDI SPA takes steps to ensure that the ILO principles on the prohibition of forced or compulsory labour and all forms of discrimination on the grounds of race, religion, sex, political opinion, descent, and social origin are respected.

### **5. Adherence to the Confindustria Code of Ethics**

#### **5.1 Adherence to the Charter of Values and Principles**

The Charter of Values and Principles identifies the fundamental cornerstones that define the ethical standards of the system and set the behavioural coordinates for all its components in line with the Confindustria vision.

##### **1. Representation**

Società Italiana Gas Liquidi S.p.a. recognises the role of Confindustria as a body that is responsible for representing and promoting, in a unified, organic and strategic manner, the interests of companies at all levels, in a logic of mutual respect and recognition, equal dignity, valorisation and synthesis of differences. The Association represents an essential point of reference, both nationally and internationally, for the definition of industrial policies aimed at contributing decisively to the economic, social, civil and cultural development of the country.

##### **2. Association identity**

Società Italiana Gas Liquidi S.p.a. is aware that Confindustria bases its associative identity on the free market and on the centrality of entrepreneurship and enterprise. Three elements that, through correct and balanced competitive mechanisms, guarantee innovation and the widespread creation of value and lay the foundations for the pursuit of the common good, within a framework of solid ethical references and respect for and defence of legality.

### 3. Responsibility

Doing business imposes an ideal and moral tension that is indispensable to face the challenges of development and the market. With this in mind, responsibility for the decisions taken, the activities undertaken and the impacts generated represents one of the essential elements on which to focus the definition and implementation of policies and actions oriented towards sustainability, innovation and the competitiveness of the country, such principle also includes the responsibility to respect commitments to the different Stakeholders.

### 4. Legality and association rules

The principle of legality and respect for rules are the foundation of the entire confederal system. Società Italiana Gas Liquidi S.p.a. ensures and promotes, internally and in all the communities in which it operates, respect for laws, standards and rules, as the basis of the covenant of civil coexistence. It also guarantees the protection and safeguarding of its functionality, reputation, image and decorum.

### 5. Accountability

Società Italiana Gas Liquidi S.p.a. considers essential, at every associative, entrepreneurial and institutional level, the need to account to all stakeholders for the decisions taken, the actions undertaken and the results achieved. It supports, promotes and urges, in every sphere, the adoption of systematic and periodic forms of reporting, also through innovative solutions of communication and information sharing.

### 6. Ethics and transparency

Società Italiana Gas Liquidi S.p.a. is aware that where ethics and transparency do not exist, there is no possibility of development for a healthy economic activity and a free and aware civil society. The company orients its actions, both in its relations with associations and in its relations with stakeholders, according to conduct marked by ethics and transparency, based on integrity, fairness, loyalty, impartiality, independence and autonomy of judgement, clarity of positions taken and of the decision-making and implementation mechanisms adopted, and absence of conflicts of interest.

### 7. Sustainability, innovation, competitiveness

Sustainability is the way to pursue, in an integrated manner, economic, social and environmental objectives. Società Italiana Gas Liquidi S.p.a. reaffirms that greater competitiveness for our country on international markets depends, in particular, on the creative and innovative strength of companies, capable of combining economic growth, social cohesion in the territories and the protection of natural capital. This approach, aimed at an efficient and effective use of resources, an increase in their productivity and a strong differentiation in the markets, makes it possible to achieve value creation processes that are sustainable over time, to the benefit of the entire community.

### 8. Relation with stakeholder

Società Italiana Gas Liquidi S.p.a. pursues and contributes to the realisation of advanced economic-social policies through the definition of participatory and shared processes between companies, public entities and civil society. The company recognises the interests of the Stakeholders, respects their expectations and, through listening, dialogue, confrontation, involvement and the enhancement of relations, undertakes to develop targeted, shared and consistent project initiatives.

### 9. System

Società Italiana Gas Liquidi S.p.a. acts as the fulcrum of a system of relations, collaborations and networking at every level, local, national and international, aimed at realising the sharing of resources, the exchange of skills and knowledge, the activation of synergies and the achievement of shared objectives and goals for the development of companies and for the benefit of the country.

## **5.2 Adherence to the Confindustria Commitment Charter (towards Stakeholders)**

The Charter of Commitments calls Confindustria and its member companies to pay strong attention to the prerogatives of Stakeholders and identifies a path of interaction, comparison and collaboration with the various stakeholders.

At the same time, it calls for attitudes and orientations in line with Confindustria's values, principles and commitments for some key categories (first and foremost the associates).



1. Companies (associated and not associated)

Enterprises are, by definition, the place of innovation and the driving factor of wealth, not only material, but also cultural and civil, of a country. Confindustria, as the main organisation representing national enterprises, has, therefore, a crucial role, as it acts and carries out its activities in the primary interest of its member companies. Moreover, in its action to support companies, it ensures equal dignity, listening and dialogue, transparency and involvement, appreciation, recognition, respect and synthesis of interests.

2. Associative universe

Società Italiana Gas Liquidi S.p.a. pursues its institutional aims through the full exploitation of relations with the territorial and sector Associations and with the other subjects that fall within the scope of the association system. The Company's activity towards them is based on the criteria of sharing, cooperation, proximity and transparency.

At the same time, in order to ensure uniformity and consistency of behaviour and an action characterised by the highest ethical standards, Società Italiana Gas Liquidi S.p.a. also requires other companies to behave in line with its values and principles.

All member companies of Confindustria must participate and contribute to the life of the association and operate in the exclusive interest of the organisation to which they belong, respecting its directives, avoiding behaviour that may harm its unity, protecting its profile, functionality and decorum, undertaking to resign, or to self-suspend, in the event of situations of incompatibility or actions detrimental to the system in its various articulations.

3. Human Resources

Società Italiana Gas Liquidi S.p.a. believes that the contribution of human resources is essential. For this reason, it ensures its employees and collaborators working conditions that are fair, safe, respectful of dignity, equal opportunities and free from any form of discrimination or exploitation. The company also provides for the training, development and enhancement of the skills and talents of its employees and collaborators, thus favouring their personal and professional growth. At the same time, Società Italiana Gas Liquidi S.p.a. requires its employees and collaborators to behave with full loyalty, fairness, integrity, loyalty, in line with the duties of their office.

4. Institutions and Bodies (national and international)

Società Italiana Gas Liquidi S.p.a. interacts, at different levels and in relation to the issues it deals with, with Bodies and Institutions, respecting the reciprocal and specific areas of responsibility, roles and prerogatives.

The company presents itself as a representative, authoritative, constructive, reliable, independent and autonomous interlocutor, able to collaborate with institutions and bodies, locally, nationally and internationally, to define innovative economic and development policies, in the interest of the companies and the various communities involved.

5. Social partners

Società Italiana Gas Liquidi S.p.a. proposes itself as an active, loyal and reliable interlocutor of the social partners on the issues of labour and industrial relations, competitiveness, development, at company, territorial, national and international level.

It is a matter of constructively interpreting and addressing changes in the scenario, which require a systematic and responsible approach, aimed at project sharing on challenges of crucial importance for individual companies, territories, production sectors and the entire country.

6. Country System (economy, culture, political science and society)

The business system is an essential development factor for the Country System as a whole. Società Italiana Gas Liquidi S.p.a. interacts, collaborates and shares, in full respect of the specific areas of autonomy and influence, objectives, resources, skills, experiences and initiatives with the world of economics and finance, culture and research, science and technology, politics, information and civil society.

7. Community and territory

In a logic of corporate citizenship, the role of companies for the development of the territories and communities in which they are embedded is crucial. In parallel, the growth and competitiveness of the companies themselves depend on the quality of the local territorial systems.

Società Italiana Gas Liquidi S.p.a. actively oversees the processes of dialogue and comparison with all the components of the reference community and the territory, in order to build system innovations that are able to synthesise the various instances and interests, to contribute to the common good through sustainable development models.

#### 8. Environment

Società Italiana Gas Liquidi S.p.a. considers natural capital, i.e. the environmental resources and services provided by ecosystems, to be a fundamental asset for the balanced development of companies and territories. Eco-efficiency and the green economy are factors of success and competitiveness in the current confrontation on international markets; companies, through careful and innovative management, can not only reduce their impacts, but also have a regenerative effect on the environment. The company therefore promotes advanced management practices, so as to favour prevention, recycling and recovery of resources and a conscious protection and valorisation of ecosystems.

### 5.3 Adherence to the Code of Conduct

The association's Code of Ethics and Values, in its various components, represents the reference framework for the entire association system.

By signing the association's Code of Ethics and Values, territory and sector associations, at the different levels, associated entrepreneurs and employees respect and promote its values, principles and commitments towards the different stakeholders.

Furthermore, the different associations are called upon to acknowledge the association's code of ethics and values and to adopt consequent behaviour.

The ethical-value framework represented by the Code of Ethics and Associative Values imposes consistent obligations and requirements on the following actors of the system:

- Associated entrepreneurs
- Entrepreneurs holding associative offices
- Entrepreneurs representing the System in external bodies
- Employees.

#### Associated entrepreneurs

As founding components of the confederal system, associated entrepreneurs must behave according to the highest ethical standards, in full consistency with the values, principles and commitments stated in the Code of Ethics and Association Values.

Therefore, Società Italiana Gas Liquidi S.p.a. undertakes to ensure:

in all the communities in which it operates, respect for laws, standards and rules, as the basis of the covenant of civil coexistence

- its own contribution to the economic, social, civil and cultural development of the country, through innovative processes aimed at the widespread creation of value, the promotion of the common good and the affirmation of models of excellence
- its employees and collaborators fair, safe working conditions, respectful of dignity, equal opportunities and free of any form of discrimination and exploitation, capable of fostering their human and professional development;
- in all contexts, conduct characterised by ethics and transparency, based on responsibility, integrity, fairness, equity and free market
- that ethical, social and environmental criteria are promoted in vendor rating processes;

- in relations with Bodies, Institutions, political parties, mass media and other public or private parties, fairness, independence, integrity and respect for reciprocal and specific areas of responsibility, roles and prerogatives;
- in environmental management, advanced managerial practices, oriented towards prevention, recycling and recovery of resources and a conscious protection and enhancement of ecosystems.

In association life, Società Italiana Gas Liquidi S.p.a. ensures:

- a strong and active participation, contributing to the correct and orderly development of the life and activities of the system, in full integrity and autonomy;
- to operate in the exclusive interest of the Association (Confindustria), respecting its directives, avoiding behaviour that may damage its unity and protecting its profile, functionality and decorum. This implies contributing to the associative debate, ensuring an effective resolution of issues within the confederal system;
- a responsible and balanced behaviour, avoiding situations of conflict of interest and the assumption of offices, of a political nature or in external associations, which could jeopardise their independence, fairness, integrity and autonomy in judgement, to the detriment, therefore, of the confederal system. Furthermore, in a logic of full transparency and fairness, they undertake to communicate in advance to the Associations of the system other memberships in non-competing organisations;
- a full and timely communication of any condition likely to change relations with other entrepreneurs and/or with the Association, requesting the necessary and adequate support.

Furthermore, Società Italiana Gas Liquidi S.p.a. undertakes to take into account, in all its professional and associative conduct, the repercussions of its choices on the entire business community and on the confederal system. Therefore, it undertakes as a company to:

- fully apply laws and labour contracts
- behave fairly towards its employees, favouring their professional growth and safeguarding their safety at work;
- adopt a fair and correct attitude towards customers, suppliers and competitors;
- maintain relations inspired by fairness and integrity with the public administration and political parties;
- consider environmental protection and the prevention of all forms of pollution a constant commitment.

As an associate, it undertakes to:

- participate in the life of the association
- contribute to the association's choices with full integrity and autonomy from internal and external pressures, having as a priority the interest of the entire category and of the Association;
- to establish and maintain a full associative relationship and exclude the possibility of associative relationships with competing or conflicting organisations; to inform the Associations of the System in advance of other memberships

to comply with the directives to be provided by the Association in the various matters and to express personal positions in advance in the proper fora for internal debate;

- promptly inform the Association of any situation that may alter its relationship with other entrepreneurs and/or with the Association, requesting the necessary and appropriate support.

## **5. Method of Implementation**

To enforce the Code of Ethics, the Board of Directors appoints and dismisses the Supervisory Board for the internal control, identifying the community in which SOCIETA' ITALIANA GAS LIQUIDI SPA operates subjects with ethical and professional characteristics that can guarantee quality, independence and authority in decision-making.

### **• Duties of the Supervisory Internal Control**

The Code of Ethics competes with the Supervisory Board for the internal control the following tasks:

- Take decisions in respect of infringements of the Code of significance reported by the head of department;
- Expresses binding opinions on the revision of the relevant policies and procedures to ensure consistency with the Code of Ethics;
- Periodically review the Code of Ethics.

To this end, the Supervisory Board will assess:

- Communication plans and ethics training;
- The work plan prepared by the department managers for compliance with the Code of Ethics.

### **• Communication and training**

The Code of Ethics is brought to the attention of internal and external stakeholders through appropriate communication activities (for example, delivery to all employees a copy of the Code, inclusion in the company website as well as on the corporate intranet inclusion of a notice of adoption of the Code in all contracts, etc.).

In order to ensure that all SOCIETA' ITALIANA GAS LIQUIDI SPA employees correctly understand Model 231 and the principles of the Code of Ethics, the latter carries out training activities aimed at promoting knowledge of Model 231.

### **• Reporting of stakeholders**

SOCIETA' ITALIANA GAS LIQUIDI SPA shall establish for each stakeholder communication channels in which to address their reports.

Alternatively, all the stakeholders of SOCIETA' ITALIANA GAS LIQUIDI SPA may report in writing any violation or suspected violation of the Code of Ethics to the Supervisory Board, which will analyse the report, possibly hearing the author and responsible for the alleged violation.

The Supervisory Board acts to protect informants against any kind of retaliation as an act that could give rise, even the suspicion of being a form of discrimination or punishment (for example, for suppliers: interruption of the relations of business; for employees: failure to promote, etc.).

It is also ensured the secrecy of the informants' identity, unless legal obligation, where it is not necessary that this identity is made evident.