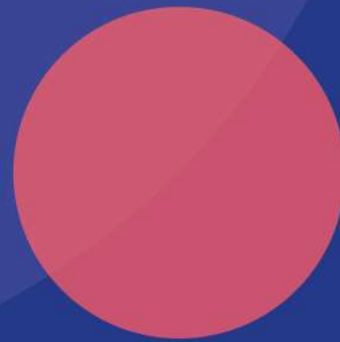


# Nets Sustainability Suppliers' Code of Conduct



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## 1. Introduction:

- 1.1. Nexi Group is an international payments company that seamlessly connects consumers, companies, and financial institutions throughout Europe. Our unwavering commitment extends beyond financial transactions, encompassing robust values in the realms of social responsibility, environmental stewardship, and governance integrity, on its own operations and through its entire value chain.
- 1.2. Nexi actively works to create positive impact and sustains a cycle of well-being among suppliers, clients, and business partners across all the countries within our operational scope. Upholding these principles, Nexi aspires to forge business relationships rooted in trust and long-term cooperation, fostering mutually beneficial and sustainable collaborations.
- 1.3. Aligned with international principles and corporate responsibility laws, Nexi has created a Suppliers' Sustainability Code of Conduct. This document articulates our expectations for all suppliers and business partners engaged in delivering products and services to Nexi. It serves as a testament to our commitment to responsible business practices and reinforces our pursuit of a sustainable and ethical business ecosystem.

## 2. Corporate Commitment

- 2.1. The Suppliers' Sustainability Code of Conduct is applicable not only to the Supplier but extends its reach to encompass all employees or representatives delivering goods or services to any of Nexi's business units or affiliates. It stands as a foundational requirement for establishing and maintaining a business relationship with Nexi.
- 2.2. To engage in a partnership with Nexi, the Supplier is required to ensure strict adherence to the principles outlined in this Suppliers' Sustainability Code of Conduct. This commitment serves as a fundamental prerequisite, underscoring the Supplier's shared dedication to responsible business practices.
- 2.3. Outlined within the Suppliers' Sustainability Code of Conduct are essential requirements that the Supplier must uphold as a baseline standard. However, Nexi encourages the Supplier to embrace flexibility within this framework, allowing for the implementation of policies that surpass the minimum requirements, whether voluntarily adopted or necessitated by legislation. This flexibility is pivotal in fostering an environment of continuous improvement and exceeding compliance expectations.

### 3. Mission and Objectives

The purpose of this Sustainability Suppliers' Sustainability Code of Conduct is to:

- 3.1. Set Standards: Establish clear guidelines and expectations regarding environmental, social, and ethical responsibilities for suppliers and subcontractors throughout the value chain.
- 3.2. Promote Accountability: Encourage transparency, accountability, and adherence to sustainable practices while fostering a culture of continuous improvement.
- 3.3. Drive Change: Influence positive change by empowering suppliers and subcontractors to embrace sustainability, ethical labor practices, and community engagement.
- 3.4. Ensure Compliance: Ensure compliance with legal requirements, industry standards, and ethical business practices across the entire supply chain.
- 3.5. By adhering to this Suppliers' Sustainability Code of Conduct, suppliers and subcontractors align themselves with our commitment to sustainability, contributing to a more ethical, environmentally conscious, and socially responsible business ecosystem.

### 4. Operational Guidelines

- 4.1. Environmental Responsibility: Suppliers and their subcontractors should commit to minimizing their environmental impact by reducing carbon emissions, conserving resources, and managing waste responsibly. This includes adhering to local and international environmental regulations. Throughout the entire value chain, efforts should be made to mitigate environmental harm.
- 4.2. Ethical Labour Practices: Suppliers and their subcontractors must uphold fair labor standards, ensuring safe working conditions, fair wages, and prohibiting any form of forced or child labor. They should support diversity, equality, and inclusion within their workforce and the extended value chain.
- 4.3. Transparency and Accountability: Suppliers and subcontractors are expected to be transparent about their operations, providing accurate and comprehensive information on their sustainability practices. They should be accountable for their actions and open to third-party audits to verify compliance. Ethical behavior and fair dealing must govern all business relationships. A right-to-audit clause should be included, allowing for periodic audits to ensure adherence to this code.

- 4.4. Supply Chain Responsibility: Suppliers should promote sustainability throughout their supply chains, including subcontractors, encouraging them to adopt similar ethical and environmental standards. Each entity within the value chain is responsible for ensuring ethical practices.
- 4.5. Innovation and Improvement: Suppliers and subcontractors should continuously strive for innovation in sustainable practices, seeking opportunities to improve their environmental and social impact across the entire value chain. It's imperative that they update their sustainability assessment annually to reflect progress and evolving standards.
- 4.6. Community Engagement: Suppliers, subcontractors, and all entities in the value chain should engage with local communities in a positive manner, respecting their cultures and supporting initiatives that benefit these communities.
- 4.7. UN Global Compact: the Supplier should respects Principles of the United Nations Global Compact as stated on the UN Global Compact website (<https://unglobalcompact.org>).

## 5. Regulatory Compliance

- 5.1. The supplier, along with all its entities, inclusive of subcontractors, must comply to the pertinent laws, regulations, and industry standards governing sustainability and business ethics. It is imperative that their practices align seamlessly with legal requirements across the entirety of the value chain.
- 5.2. As a fundamental reference point, especially relevant for all entities operating within the EU irrespective of their sectors, the supplier is expected to comply with the following regulations, contingent upon their applicability:
  - 5.2.1. UN Universal Declaration of Human Rights
  - 5.2.2. UN declaration against corruption
  - 5.2.3. The ILO's eight core conventions 29, 87, 98, 100, 105, 111, 138 and 182
  - 5.2.4. UN Convention on the Rights of the Child
  - 5.2.5. Labour laws, including minimum wage legislation, and the social security protection that applies in country of manufacture.
  - 5.2.6. Environmental protection legislation that applies in the country of manufacture
  - 5.2.7. EU Waste Framework Directive 2008/98
  - 5.2.8. EU Persistent organic pollutant regulation 2019/1021
  - 5.2.9. EU Mercury and Repealing Regulation 1102/2008
  - 5.2.10. EU Forest degradation Regulation 2023/1115
  - 5.2.11. EU Data Protection Regulation 2016/679 and 2016/680
  - 5.2.12. EU Corporate Sustainability Reporting Directive
  - 5.2.13. EU Corporate Sustainability Due Diligence Directive

## 6. Due Diligence Framework

- 6.1. The Supplier must annually to fill Nexi's sustainability assessment questionnaire, which is designed to comply with current and forthcoming EU legislation on third-party due diligence, especially the Norwegian Transparency Act, the Modern Slavery Act (UK), the Supply Chain Act (DE), the Corporate Duty of Vigilance (FR), the Child Labour Due Diligence Law (NE), and the forthcoming CSDDD (EU).
- 6.2. Nexi diligently conducts ongoing assessments to evaluate our suppliers' adherence to the Suppliers' Sustainability Code of Conduct and relevant legislation. Assessments may be required and requested from the Supplier, and these evaluations can be conducted by Nexi internally or by a third party, upon previous agreement.
- 6.3. This rigorous process ensures thorough verification of the supplier and sub-supplier's commitment to fulfilling the obligations outlined in the Suppliers' Sustainability Code of Conduct.

## 7. General Obligations:

- 7.1. The Supplier must implement and monitor a sustainability framework for its own operations, covering all topics regulated by the European Sustainability Reporting Standards. This framework emphasizes those deemed material according to its materiality assessment.
- 7.2. According to its materiality exercise and report, the Supplier must set targets and have them vetted by the Science-Based Target Initiative or a similar competent and independent institution, especially those related to decarbonization, for the short and long term. The Supplier must report to Nexi on the progress and status of these targets on an annual basis.
- 7.3. Regarding its Value Chain, the Supplier must implement and monitor a due diligence process in its value chain, covering most of its supply chains beyond the top tiers (at least 70% of the total volume and/or spending), including but not limited to vendors, contractors, and subcontractors, under the same basis of control, especially those deemed material to the provider's organization.
- 7.4. Along with the process, the Supplier must take appropriate measures to prevent or adequately mitigate potential adverse impacts and to implement auditable contractual assurances to and from its direct partners.

## 8. Whistleblower Protocols

- 8.1. The supplier is required to establish and uphold an autonomous whistleblowing mechanism that encompasses both internal and external stakeholders. This mechanism should feature a fully transparent process for handling incidents. It must provide a secure avenue for employees and third parties to confidentially report any instances of non-compliance with the Suppliers' Sustainability Code of Conduct.
- 8.2. Additionally, the supplier has the option to leverage Nexi's independent and anonymous Whistleblower mechanism. This resource, accessible on <https://nexigroup.whistleblowernetwork.net/frontpage>, can be extended for use by the supplier's employees and throughout its value chain. This collaborative approach enhances transparency and reinforces a commitment to ethical practices across both entities.

## 9. Information Disclosure Duties

- 9.1. The Supplier must share information and data with Nexi, including but not limited to sustainability reports, materiality assessments, target progress, ongoing sustainability projects, and general sustainability data, as per Nexi's request.
- 9.2. Nexi will always respect its suppliers' intellectual property and will not request such sensitive information. This is for reporting and compliance purposes, according to the same regulations and to any eventual new ones during the contract period and one fiscal year after.

## 10. Handling Breaches

- 10.1. The Supplier acknowledges that persistent or significant violations of this Suppliers' Sustainability Code of Conduct may be considered a breach of the contractual relationship with Nexi. Nexi retains the right to terminate any contract with the Supplier, in accordance with contractual terms and obligations. Nevertheless, Nexi may opt to maintain the relationship with the Supplier by implementing a remediation plan.
- 10.2. In the event of any issues or conflicts, of any nature, pertaining to this Suppliers' Sustainability Code of Conduct, the Supplier is obligated to promptly notify Nexi in writing at <https://nexigroup.whistleblowernetwork.net/frontpage>. Immediate communication ensures swift resolution and demonstrates the Supplier's commitment to addressing and rectifying any concerns.

## 11. Acknowledgment and Acceptance:

The Supplier affirms having accessed and agreed to comply with the Nexi Suppliers' Sustainability Code of Conduct, which is accessible online at <https://www.nets.eu/about-nets/csr>. This acknowledgment will also be formalized and affirmed upon the signing of the contract with Nexi, within its Environmental, Social, and Governance (ESG) section.