

Immobiliare Grande Distribuzione
Società di Investimento immobiliare Quotata
S.p.A. (IGD SIIQ S.p.A)

RESPONSIBLE SUPPLY CHAIN POLICY

Effective 1/10/2024

INTRODUCTION – ESG Strategy

IGD SIIQ is the Italian leader of the retail real estate sector: IGD buys shopping centers, hypermarkets, supermarkets and/or malls, already operational or newly built, in Italy and Romania, in order to create long-term value. The company is also involved in property management and provides services to its mall tenants.

Beginning in 2011 IGD, aware of the importance of social and environmental responsibility in pursuing healthy and long-term growth, decided to embark on a structured sustainability path.

Since 2013 IGD has included sustainability in its strategic planning, involving both internal and external stakeholders. The "Becoming G.R.E.A.T." strategy, launched in 2017, testifies the desire to promote sustainable growth which focuses on environmental issues (Green), people (Responsible), ethics (Ethical), in attractive places (Attractive), together with the stakeholders (Together)¹.

The company identifies and regularly updates the material issues to determine targets and assess sustainability risks; each year IGD monitors the results achieved and reported in the sustainability report, the content of which is defined based on the relative international standards, as well as those specific to the real estate sector.

In 2012 the company undertook a path leading to both environmental and ethical certification of its activities. At the end of 2023 the environmental management system and 95% of the real estate portfolio were ISO14001 certified. At the same date, 10 of the Company's shopping centers (or 64% of the total value) had obtained BREEAM IN USE certification. In 2020 IGD's "Anti bribery management system" also obtained UNI ISO 37001:2016 certification.

IGD has joined to the Global Compact, the most relevant sustainability initiative worldwide promoted by the United Nations, since 2020.

In accordance with Legislative Decree 231/2001, in 2006 IGD adopted the Organizational, Management and Control model to ensure honesty and transparency in business transactions and company activities for all stakeholders. The Company has amended this Model over time, in order to comply with regulatory changes (the most recent amendment was approved during the BoD's meeting held on 1/8/2024 and can be found on the company's website at <https://www.gruppoigd.it/en/governance/business-ethics/organizational-model/>).

The basic principles of this document

- IGD intends to build long term relationships with its suppliers based on the understanding of how important a shared commitment to sustainability is.
- This Responsible Supply Chain Policy defines what Gruppo IGD views as the standards needed for safe and healthy working conditions, as well as the environmental responsibilities along the supply chain, consistent with the Group's sustainability strategy "Becoming G.R.E.A.T."


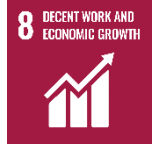

¹ For more information refer to the following pages on the corporate website <https://www.gruppoigd.it/en/sustainability/our-sustainability-strategy/> and <https://www.gruppoigd.it/en/sustainability/our-priorities/>

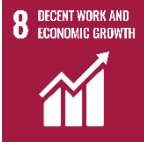

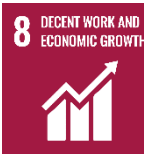
Who and which activities are covered by the policy

- The provisions of this document are applicable to all of Gruppo IGD’s business partners within the scope of their collaboration with the company, namely providers of goods and services, as well as contractors. This Policy is applicable to all contracts with a value of more than €10,000. This Policy is also applicable to the Consortia through which IGD exercises operational control in the shopping centers.
- Any sub-contractors and similar along the Group’s supply chain are subject to the same provisions. For this reason, IGD encourages the supplier to promote the principles described in the Responsible Supply Chain Policy with the suppliers and sub-contractors with whom the supplier works to provided products and services to the Group.
- The suppliers who work with the Company must acknowledge having received and read this document: signing this document is, in fact, of fundamental importance to the next step, namely signing the contract.
- By signing this document, the supplier declares to have examined, as well as understood, the details and provisions therein, and will take all the steps needed to comply with its essential components.
- This document will be published on the company website and may be updated and amended over time. The Company will inform the suppliers affected of the changes made.










Strategic goals




Respect for people

Strategic goals	EU goals	United Nations’ SDGs
<p>The supplier agrees to:</p> <ul style="list-style-type: none"> • avoid any type of discrimination (based on, for example, gender, race, ethnicity, religion, language and political opinions) in employment, guaranteeing fair treatment for all employees; • respect the right to freedom of association, protection of the right to organize and the right to collective bargaining; • not use forced, mandatory, undeclared or illegal labor; • not use child labor; • comply with national laws relating to working hours, minimum wage and stable pay periods, basing these practices on the national and/or company contractual agreements; • abstain from using illegal workers and manage their supply chains with care. • guarantee respect for all workers and prevent any form of harassment and adopt an anonymous whistleblowing system. 	<p>Respect for human rights and working conditions</p>	  

<p>The supplier agrees to:</p> <ul style="list-style-type: none"> • respect all international laws designed to fight corruption. Toward this end, the tenant will acknowledge IGD’s commitment to anti-corruption which can be found at https://www.gruppoigd.it/en/governance/business-ethics/anti-corruption/; • disclose any potential or current conflicts of interest which could impact the interactions with Gruppo IGD and its employees; • avoid practices that could compromise competition; • pay taxes regularly and actively prevent any and all activities connected to tax evasion; • take all precautions needed to prevent fraud, including reporting any suspicions to the competent authorities and to IGD; • contribute to the fight against money laundering and the financing of terrorism; • attach the anti-mafia certification issued by the prefecture or the substitute declaration issued pursuant to Presidential Decree 445/2000 to the supplier agreement. 	<p>Respect ethical conduct</p>	
<p>The supplier agrees to:</p> <ul style="list-style-type: none"> • create a workplace environment which protects personal dignity and guarantees the health and safety of all employees. This includes a commitment to ensuring that personnel understand the importance of using adequate personal protective and professional equipment; • ensure that personnel receive training in the correct use of the products, tools and machinery provided, while also guaranteeing that these tools and equipment are suitable for the tasks and activities being performed; • maintain the safety and confidentiality of data referring to IGD or its tenants and visitors, in accordance with the GDPR, by using adequate monitoring systems. These data will not be shared with third parties without the express consent of IGD. 	<p>Workplace safety</p>	 

Respect for the environment

Strategic goals	EU goals	United Nations' SDGs
<p>The supplier agrees to:</p> <ul style="list-style-type: none"> use efficient tools and machinery in the use of energy, water and other consumables to minimize waste. Work to increase the awareness of employees about the impact of their conduct. 	<p>Energy efficiency</p>	  
<p>The supplier agrees to:</p> <ul style="list-style-type: none"> actively seek to limit the environmental impact of its activities, particularly with respect to lowering the emission of greenhouse gases, in order to fight ongoing climate change; consider the use of renewable energy, for example, as well as the use of sustainable equipment and materials, and Eco-friendly transportation. 	<p>Greenhouse gas emissions</p>	 
<p>The supplier agrees to:</p> <ul style="list-style-type: none"> strive to sort waste correctly, including by using the containers provided specifically for this purpose in the shopping center; promote awareness of the circular economy with its personnel, develop new approaches to waste recovery and increase recycling as much as possible. 	<p>Waste management</p>	
<p>The supplier agrees to:</p> <ul style="list-style-type: none"> reduce air, water and soil pollution in every phase of its operations, from the production of any materials to the service supply; try to limit the noise and odors produced by its activities as much as possible. 	<p>Air, soil and water pollution</p>	  

<p>The supplier agrees to:</p> <ul style="list-style-type: none"> • promote practices and conduct consistent with this policy, also among its employees and sub-contractors/sub-suppliers. 	<p>Sustainable conduct</p>	
<p>The supplier agrees to:</p> <ul style="list-style-type: none"> • use eco-labeled materials and products as much as possible. 	<p>Responsible procurement</p>	
<p>The supplier agrees to:</p> <ul style="list-style-type: none"> • determine the impact that its activities have on biodiversity and assess strategies to reduce this impact. 	<p>Protect biodiversity</p>	

Implementation and control

- IGD will operate in accordance with this document, to the extent applicable to its business, and work to prevent its employees and partners, as well as third parties working for the Group, from acting in a way which is dishonorable and in violation of the standards included in this Policy.
- IGD asks its suppliers to sign this document when a lease and/or subsequent renewals are signed, in order to confirm that the commitment to social and environmental sustainability is shared.
- If the suppliers are unable to comply with the stipulations of the clauses signed, they must inform IGD and define any corrective actions to be taken within a certain period of time. IGD reserves the right to carry out specific audits of the tenants, as deemed opportune.
- According to whistleblowing procedures, suppliers may report conduct of IGD that does not comply with this document.