



RESPONSIBLE VALUE CHAIN POLICY

ETHICS AND SUSTAINABILITY FOR AdB

Aeroporto Guglielmo Marconi di Bologna S.p.A. (hereinafter also "AdB" or "Company"), listed on the STAR segment of the regulated market managed by Borsa Italiana S.p.A., operates as the exclusive representative responsible for the overall management of Bologna Airport. In carrying out its responsibilities, AdB adheres to the Corporate Governance Code approved by the Corporate Governance Committee in January 2020, which, pursuant to Art. 1, paragraph 1, stipulates that "the Board of Directors shall guide the company in the pursuit of its sustainable success".

In line with these principles, AdB focuses its activities on continuous improvement of the services it provides and on contributing to the development of the Bologna, Emilia Romagna and national regions, promoting an operational model based on integrity, responsibility and attention to the environmental, social and economic impacts of its decisions, including its procurement choices. The Company has defined and implemented a Sustainability Plan that covers the main ESG areas (Environmental, Social and Governance), aimed at achieving the following objectives:

- promoting a culture of sustainability;
- improving the health and safety conditions of workers and the well-being of local communities;
- promoting a workplace that is safe, inclusive and respectful of diversity;
- creating new job opportunities;
- fostering dialogue with citizens, local partners and all stakeholders.

Ethics and sustainability are fundamental pillars of the company's strategy and guide its commitment to conduct that fosters regulatory compliance, respect for human rights and the protection of natural resources. In a context characterised by evolving stakeholder expectations and stricter due diligence requirements under European regulations, such as the Corporate Sustainability Due Diligence Directive (CSDDD), the EU Deforestation Regulation (EUDR) and legislation on Road Transport Due Diligence (RTDD), AdB acknowledges that alignment of its procurement processes with ESG objectives is an essential prerequisite for its operations.

In this scenario, sustainability is understood as a process of continuous improvement, based on clear and measurable objectives. The integration of ESG criteria in procurement practices aims to maximise the positive impacts generated by the Company's activities by focusing on the characteristics of the goods and services purchased, as well as on the qualification requirements for suppliers and initiatives to engage business partners. The aim is to help build a responsible and transparent supply chain that complies with applicable regulations, founded on business relationships characterised by fairness, integrity and collaboration.

PURPOSE AND SCOPE OF APPLICATION

AdB's so-called "supply chain" reflects the diversification and complexity inherent in airport operations. The Company purchases a very wide range of products and services, outsourced services and contracted work, with a supplier base consisting largely of small and medium-sized enterprises. This system calls for a structured approach to managing environmental, social and governance (ESG) impacts throughout the entire procurement process.

To this end, AdB has implemented a system of compliance with regulations and company policies relating to ethics and health and safety, as set out in its contracts with suppliers and business partners. Contractual clauses, such as those relating to Model 231, the Code of Ethics and the Supplier and Commercial Partner Code of Conduct, are designed to ensure that suppliers and partners operate in accordance with high standards of ethical behaviour and social responsibility. AdB has also introduced preferential criteria in competitive selection processes, with a focus on sustainability standards, the possession of ESG certifications and, where relevant, the submission of specific proposals, particularly in the environmental field.

This Responsible Value Chain Policy (hereinafter also "Policy" or "Document") sets out the framework through which AdB integrates ESG principles into its procurement procedures, in line with international best practices, including the principles outlined in ISO 20400 - Sustainable Procurement: Guidance, and with the obligations arising from the European regulatory framework on due diligence in the value chain. The Policy aims to combine operational efficiency, risk management and accountability in the selection, assessment and management of suppliers.

In this context, the Policy governs the adoption of criteria and controls designed to:

Create value and strengthen risk management

- identify, prevent and mitigate ESG risks throughout the supply chain, promoting the Company's operational continuity and financial soundness;
- foster stable and transparent relationships with suppliers, based on integrity, professional conduct and reciprocity;
- integrate ESG requirements into qualification and assessment procedures, alongside technical, economic, financial and compliance aspects.

Ensure high ethical standards and compliance

- ensure that all procurement activities are carried out in compliance with applicable regulations, the Company's internal policies, and the ethical principles set out in the Code of Ethics and the Organisation, Management and Control Model envisaged by Legislative Decree 231/2001;
- encourage suppliers and business partners to comply with the Supplier and Commercial Partner Code of Conduct, as a means of ensuring alignment with the minimum requirements on human rights, working conditions, integrity, environmental protection and regulatory compliance;
- carry out periodic checks and audits on suppliers and business partners deemed critical, ensuring constant monitoring of ESG requirements and encouraging prompt implementation of corrective measures.

Promote social and environmental responsibility along the entire supply chain

- give preference to goods and services that meet environmental and social requirements in line with the sustainability standards adopted by the Company;
- work with business partners through information and training activities, improvement programmes and engagement initiatives aimed at promoting alignment with ESG principles;

- require suppliers and business partners to demonstrate an increasingly higher level of transparency through the collection of data, indicators and verifiable documentation, as well as, where deemed appropriate, participation in recognised ESG assessment platforms.

Ensure monitoring, transparency and continuous improvement

- design structured systems to monitor the ESG performance of suppliers and business partners, based on measurable data and indicators that are collected periodically and aligned with the objectives of the Sustainability Plan;
- ensure clear and transparent reporting on the main impacts of procurement, promoting accountability to internal and external stakeholders;
- promote regular reviews of procurement procedures and tools in order to ensure their adequacy with respect to developments in legislation, the market and international best practices.

Implementation of this Policy enables AdB to translate its ESG strategy into concrete operational practices, ensuring that the entire procurement function contributes to the achievement of the objectives set out in the Sustainability Plan and operates in compliance with regulatory requirements, with the principles of integrity and with the due diligence safeguards applicable to the supply chain.

GUIDING PRINCIPLES AND STANDARDS

This Policy is based on internationally recognised principles and standards, the main ones of which are listed below:

- UNI EN ISO 20400:2017 Sustainable Procurement, Guide
- Strategic Public Procurement (SPP), Definition by the European Commission
- United Nations Global Compact (UN Global Compact), United Nations (UN)
- OECD Due Diligence Guidance for Responsible Business Conduct, OCSE
- United Nations Guiding Principles on Business and Human Rights (UNGPs), United Nations (UN)
- Core Conventions of the International Labour Organisation, ILO
- Universal Declaration of Human Rights (UDHR), United Nations (UN)

To ensure that environmental and social aspects are adequately taken into consideration in purchasing decisions, this Policy is an integral part of the internal systems documents applicable to the process, including the Company's Code of Ethics, the Supplier and Commercial Partner Code of Conduct and the Anti-Corruption Policy.

RESPONSIBILITY AND OVERSIGHT

AdB's Strategic Sourcing and Procurement Management function, in collaboration with the other business functions involved in procurement processes and in managing relationships with suppliers and business partners, coordinates the implementation of this Policy, promoting the integration of the principles set out herein into operational activities and facilitating their ongoing monitoring and updating.

ESG PRINCIPLES FOR PURCHASES MADE BY AdB

AdB incorporates ESG principles into its procurement decision-making processes in order to ensure that decisions are transparent, responsible and consistent with the company's sustainability objectives and applicable regulatory requirements.

ENVIRONMENTAL PRINCIPLES

AdB promotes procurement practices that respect the environment and natural resources, reduce impacts throughout the product life cycle, and ensure the responsible use of energy and resources.

To this end, AdB is committed to orienting its design, selection and decision-making processes in accordance with the following principles:

Regulatory compliance and management systems

AdB ensures compliance with the Minimum Environmental Criteria (MEC), where applicable, and gives preference to suppliers who adopt recognised certifications and management systems (e.g. ISO 14001, ISO 45001, ISO 50001, etc.), consistent with the specific type of good, service, work or sub-contract.

Sustainable use of resources and certified materials

When selecting materials, AdB takes into account the origin, composition and certification of the resources used, preferring recycled or recyclable materials, or those sourced from certified supply chains (e.g. FSC/PEFC for paper and wood, GRS and OEKO-TEX for textiles).

Waste reduction and promotion of reuse

AdB favours goods and services that reduce waste generation, promote reuse (for example, through recyclable and reusable water dispensers, reclaimed furniture and refurbished IT equipment, where possible) and/or include collection and disposal management schemes (for example, for used toner cartridges, nylon from baggage handling or obsolete electronic equipment).

Sustainable construction and Green Building criteria

For work and supplies relating to the construction of buildings or infrastructure, AdB promotes sustainable construction criteria, with a particular focus on minimum environmental criteria (MEC), energy efficiency, certified materials or those containing recycled content, and the adoption, where technically feasible, of design protocols with voluntary sustainable building certifications such as LEED.

Energy efficiency and reduction of emissions

In its procurement decisions, AdB takes into account energy consumption and efficiency, durability, and the reduction of direct and indirect emissions, promoting the purchase of energy from certified renewable sources. For infrastructure, facilities and energy-related purchases, requirements are adopted to ensure improved energy performance in line with the company's decarbonisation targets and the technical and economic availability of the alternatives present on the market.

Low-impact logistics

In accordance with the principle of *favor participationis* (favouring participation), AdB does not restrict participation in tenders based on geographical criteria. However, it may add value to solutions that reduce the logistics impact, through local warehouses, efficient delivery systems or operational plans to reduce transport emissions.

Responsible management of chemicals and hazardous substances

AdB requires the use of products that comply with applicable regulations, the use of certified materials (e.g. Ecolabel for cleaning products) and criteria relating to safety, traceability and the proper management of substances with potential environmental impact.

Environmental criteria for canteen services

AdB is in favour of the use of local or seasonal products, the availability of organic options, and solutions that reduce single-use plastic by promoting reusable and/or easily recyclable materials.

Innovation to reduce environmental impact

AdB values suppliers' ability to propose innovative solutions that reduce environmental impacts, improve resource efficiency or introduce technologies and practices that are more sustainable than market standards.

SOCIAL PRINCIPLES

AdB promotes procurement practices that respect human rights, health and safety, fair, safe and dignified working conditions, and social responsibility, seeking out economic operators that ensure high standards of protection for the people and communities involved.

In this respect, AdB is committed to making its planning, selection and purchasing decisions in accordance with the following principles:

Compliance with labour, safety and human rights legislation

Suppliers are required to comply with applicable national and international legislation regarding, inter alia, health and safety, labour protection, non-discrimination, minimum age, and safety of products and services. Contracts set out specific obligations in these areas, and failure to comply may result in the termination of the relationship.

Where relevant, AdB requests information from suppliers and business partners with regard to their ethical and social policies and certifications (e.g. SA 8000, ISO 45001, UNI PdR 125), which form part of the assessment criteria for the technical and quality aspects of the offer.

Labour-intensive activities

For work involving a significant number of personnel (construction, handling, cleaning), AdB specifically assesses the measures and safeguards in place to protect workers and ensure health and safety, in accordance with the provisions of current legislation.

Traceability and transparency in the supply chain

AdB promotes transparency throughout the supply chain by requesting, where relevant, documented information on the country of origin of the supply, the production chain and the social standards applied, depending on the product category and the level of risk.

Inclusion and equal opportunities

Whilst respecting the principle of free competition, AdB favourably views factors such as the involvement of social cooperatives in second-tier subcontracting, diversity and inclusion initiatives, certified gender equality policies, measures to support vulnerable groups, or other documented socially responsible practices.

GOVERNANCE PRINCIPLES

AdB conducts its procurement activities in accordance with the principles of legality, integrity, transparency, equal treatment and traceability, ensuring that decision-making processes are objective, documented and verifiable, and that they are part of the company's governance and compliance framework.

In this respect, AdB is committed to making its planning, selection and purchasing decisions in accordance with the following principles:

Transparency, competition and non-discrimination

When organising and managing public tender procedures, AdB is required to comply with the Public Contracts Code, with its own internal procurement regulations, and with the EU procurement principles (transparency, non-discrimination, proportionality). In cases where AdB is not required to comply with the principles of the European Union Treaty on the protection of competition, its procurement activities comply with private law, applying the principles of good faith and fairness.

All procurement activities are conducted with integrity, fairness and in good faith, avoiding conflicts of interest and ensuring compliance with the company's ethical principles. Regardless of the procedural framework, AdB adopts transparent selection and awarding procedures designed to secure the best market terms.

Contractual clauses and compliance obligations

Procurement/purchase contracts include specific clauses referring to the Code of Ethics, the Supplier and Commercial Partner Code of Conduct, and the Organisation, Management and Control Model pursuant to Legislative Decree 231/01, as well as AdB's right to conduct inspections, audits and checks. For specific categories of suppliers, registration and updating of profiles on ESG assessment platforms (e.g. Synesgy) may be a contractual requirement.

Integration of ESG criteria into procurement decisions

Decisions made during procurement processes are supported by objective and verifiable factors (specifications, certifications, declarations, ESG ratings and other documentary evidence). ESG criteria are integrated into the specifications and, where applicable, also into the documents soliciting offers (tenders, tender specifications, invitations), with a weighting proportionate to the nature of the contract (typically in the range of 5–10%, subject to specific provisions for particular situations).

Anti-corruption and integrity

AdB implements measures – including internal organisational measures – within its procurement processes, aimed at preventing conflicts of interest, anti-competitive practices or corrupt conduct, and it encourages the adoption of anti-corruption management systems, such as ISO 37001, by its suppliers and business partners.

ESG PRINCIPLES APPLIED TO PARTNERSHIPS WITH ENTITIES IN THE ACTIVE SUPPLY CHAIN

AdB is committed to promoting ethical and responsible practices in the activities carried out by its business partners within the active supply chain, recognising and encouraging best practices that help to reduce environmental impact, optimise the use of resources and improve social well-being. In particular, in the technical offers, priority is given to all those initiatives aimed at:

Energy efficiency and reduction of GHG emissions

Prioritising the use of energy derived entirely from certified renewable sources and the adoption of technical solutions that reduce the energy consumption of operations. Technical proposals must incorporate criteria relating to energy efficiency and the reduction of the environmental impact associated with energy use.

Environmental standards for spaces and furnishings

Encouraging the adoption of recognised sustainability standards for the design, construction and management of spaces (e.g. LEED certification), whilst also promoting the use of recycled, recyclable or eco-designed materials in order to improve the environmental impact of spaces and furnishings.

Working conditions and organisational well-being

Promoting working conditions that support a healthy work-life balance, the provision of benefits that support organisational well-being, the promotion of professional development, and initiatives aimed at fostering diversity, equity and inclusion.

Social responsibility and commitment to the local community

Supporting projects with a positive social impact, including donations, partnerships with NGOs and community support initiatives. Partners are encouraged to develop activities that generate tangible benefits for people and the local community.

Transparent supply chains and traceability

Ensuring transparency and accountability throughout all supply chains, in order to monitor the origin and quality of the materials and products used.

Low-impact mobility and logistics

Implementing efficient logistics solutions aimed at reducing the environmental impact of transport and deliveries, with a particular focus on the use of low-impact vehicles and/or the reduction of CO₂ emissions associated with transport activities.

Waste reduction and circular economy

Promoting the phasing out of single-use materials, particularly plastic, and replacing them with reusable, recyclable or environmentally friendly alternatives. Partners are encouraged to implement practical initiatives to reduce plastic use in retail outlets and catering services.

Encouraging the recovery, recycling and regeneration of materials throughout the value chain, transforming waste into new products or semi-finished goods. This includes involving all airport operators in the recovery chains for plastics, packaging and organic waste.

ESG policies and certifications

Adopting internal policies and management systems focused on sustainability and social and environmental responsibility, as well as holding recognised certifications (environmental, social or governance) that support compliance with ESG standards.

IMPLEMENTATION MECHANISMS FOR SUSTAINABILITY IN PROCUREMENT PROCESSES

Suppliers and Commercial Partners Code of Conduct

The AdB Suppliers and Commercial Partners Code of Conduct was drafted in order to establish the standards expected in commercial relations between AdB and its suppliers and business partners and to ensure that the latter comply with these standards, in order to prevent potential negative impacts on human rights and the environment, as well as to enhance their positive impacts.

The Code is based on internationally recognised principles and standards, reflecting AdB's commitment to ethical, transparent and responsible business practices. AdB promotes the application of these principles and ethical standards by publishing the Code on its official website and including specific contractual clauses that require suppliers and partners to comply with them. As envisaged by the Code, all Suppliers and Business Partners are required to operate in full compliance with human rights, guaranteeing decent working conditions for all workers and ensuring fair employment practices that promote gender equality, diversity and inclusion, with a view to safeguarding workers' rights throughout their value chain and contributing to local employment growth.

Compliance with the Code is required of all economic operators contracted to carry out works, services and supplies on behalf of Group companies, including consultants, professionals and external collaborators, as well as their subcontractors and sub-suppliers and those involved in the broader airport services supply chain.

“Synesgy” ESG assessment platform

AdB has joined Synesgy, the CRIF Group's global digital platform, to collect and manage information relating to ESG factors, in order to verify the sustainability criteria of its suppliers and other entities within its supply chain. As the lead organisation, AdB has invited its strategic suppliers to complete the questionnaire developed by Synesgy, which covers economic, social and environmental sustainability aspects. AdB requires suppliers to register and keep their profile active on the Synesgy ESG assessment platform for the entire duration of the business relationship. The recording and regular updating of data are an integral part of the contractual documents.

The main objectives of using Synesgy are:

- to obtain an overall assessment of each supplier's sustainability, via a specific ESG score;
- to monitor the ESG performance of suppliers;
- to identify any critical issues or areas for improvement throughout the supply chain;
- to incorporate the results of the ESG assessment into supplier qualification, risk analysis and audit processes;
- to engage with and support suppliers, fostering a shared path towards sustainable growth, continuous improvement in ESG performance and strengthening of the strategic collaboration.

Assessment of ESG risk

AdB has adopted a process for assessing ESG risks associated with suppliers and business partners, designed to identify environmental, social and governance issues, promote the implementation of corrective measures, and ensure that suppliers and business partners comply with the ESG standards set by the Company.

The detailed operating procedures and the allocation of responsibilities for the ESG risk analysis of suppliers and business partners are set out in a specific procedure. The ESG risk assessment, which is updated annually, enables the identification of those with the highest ESG risk and allows subsequent monitoring and control activities to be tailored to the level of risk associated with each supplier or business partner.

AdB promotes a collaborative approach with suppliers and business partners, encouraging the development of joint initiatives and programmes based on identified risks and opportunities, with a view to improving sustainability performance and fostering mutual growth throughout the entire supply chain.

ESG Audit

The results of the ESG risk assessment of suppliers and business partners may lead to Audits being conducted. Audits may be conducted on-site (at the supplier or partner's premises and/or at AdB's facilities where the supplier or partner carries out its activities) or remotely, depending on the risk associated with each entity, with the ability to promptly address any significant impacts and implement corrective action plans in the event of critical situations.

The purpose of the audits is to verify compliance with ESG requirements and assess any deviations from the ESG audit standard defined by AdB. AdB also evaluates the effectiveness of the corrective measures implemented following the audits. The audit results are a key factor in updating the risk profile of a supplier or business partner, guiding procurement decisions and improving overall supply chain performance. In this regard, the findings of these audits result in improvement initiatives and, if necessary, lead to corrective or disciplinary actions.

The approach adopted by AdB ensures that the management of suppliers and business partners is conducted in accordance with the principles of transparency, accountability and sustainability, incorporating the audit findings into decision-making processes and the planning of monitoring and continuous improvement activities.

Final provisions

This Responsible Value Chain Policy will be updated, if necessary, to ensure it remains relevant in light of changes in the business environment, the market, and applicable regulations.

The principles stated guide the activities of the business functions involved in procurement processes and in relationships with suppliers and partners, providing guidance on how to integrate environmental, social, and ethical considerations into operational decisions.

AdB promotes a collaborative approach with suppliers and partners in the supply chain, encouraging constructive dialogue to share best practices and foster continuous improvement in sustainability performance throughout the supply chain.

Adherence to the principles of this Policy promotes consistency across the various business functions and contributes to the achievement of strategic sustainability goals, emphasising shared responsibility throughout the entire value chain.

ANNEX I

This Annex outlines, for each category of product and service procured, the relevant ESG requirements and the preferred certifications applied by AdB.

The contents of this Annex are subject to periodic updates to reflect changes in regulations, technical standards, and best practices regarding sustainable procurement.

Product/Service	Applicable certifications/requirements	Description
Paper and stationery	FSC, PEFC; produced at ISO 14001, ISO 45001, and ISO 9001 certified paper mills	Sourced from certified supply chains and manufactured at paper mills with environmental, quality, and safety management systems
Pallets	/	Reusable and/or made from recycled materials
Printing material (toner)	/	Reusable toner cartridges, with the supplier collecting used cartridges as part of the rental service
Water dispensers	/	Water supply in offices and common areas via a returnable system for PET (plastic) containers, reducing waste and reusing containers
Reusable water bottles	/	Distribution of reusable water bottles to reduce single-use plastic
Clothing and textiles	GRS, OEKO-TEX, OCS, GOTS, MEC Textiles	Evaluation of offers for the management of discarded clothing (collection, reuse, maintenance/repair), transparency, traceability and social responsibility within the supply chain, organic fibre content and environmental certifications
Furniture	FSC/PEFC	Preference for certified timber and promotion of reuse and recovery
IT and electronic equipment	/	Reconditioning where possible; collection and disposal in accordance with regulations
Cleaning products	MEC Cleaning and Sanitisation, Ecolabel	Use of Ecolabel products as envisaged by the MEC
Electricity/GHG emissions	Guarantees of Origin	Purchase of energy from certified renewable sources and purchase of certified carbon credits, in support of the company's decarbonisation targets
Canteen services	/	Local, seasonal and organic products viewed favourably; reduction in single-use plastic through promotion of reusable and recyclable materials
Logistics/transport	/	Operational plans to reduce emissions; Gradual replacement of the company fleet with electric vehicles and charging infrastructure
Gifts and merchandise	/	Preference for products made by non-profit organisations and social cooperatives
Building and construction	MEC construction and Green Building principles	Adoption of recognised design protocols and environmental certifications (e.g. MEC, LEED), use of materials with low environmental impact, including XCarb® steel, and implementation of energy-efficient building services solutions, including LED lighting

ANNEX II

This Annex describes the initiatives, projects and standards applied to commercial partners operating within the airport.

The contents of the Annex are subject to periodic review and updating in order to reflect developments in the sustainability practices applied in managing partners within the supply chain.

Paragraph reference	Description of commitment required of AdB business partners	Partners involved
Energy efficiency and reduction of GHG emissions	Use of 100% renewable energy through the supply of GO-certified electricity	RET, OPO, REN, HAN
Environmental standards for spaces and furnishings	Encourage the use of materials containing recycled content and design of spaces and furnishings with a focus on eco-design	RET, OPO
Working conditions and organisational well-being	Implementation of programmes aimed at the well-being of employees, through benefits, mobility support, shift planning in favour of a healthy work-life balance, and DE&I initiatives	RET, REN, HAN
Social responsibility and commitment to the local community	Support for local projects and donations to charitable organisations	RET, OPO, REN, HAN
	Collaboration with HERA and Last Minute Market to recover and donate surplus food from food & beverage facilities and shops at the airport, for the benefit of local organisations and associations	RET, REN
Ethical supply chains and traceability	Ensure the traceability of supplies by adopting ethical and sustainability standards throughout the supply chain. This includes selecting responsible suppliers, ensuring transparency in production processes, monitoring the origin of materials, and adopting practices that ensure integrity, quality and compliance with ESG criteria	RET, OPO, REN, HAN
Low-impact mobility and logistics	Implement logistics solutions aimed at reducing the environmental impact of transport, including the streamlining of deliveries, the adoption of low-impact vehicles (e.g. electric or low-emission vehicles), the optimisation of routes, and collaboration with AdB on shared sustainability protocols, with the aim of minimising CO ₂ emissions associated with operational activities at the airport.	RET, REN, HAN
Waste reduction and circular economy	Collaboration with Onlus Plastic Free to replace single-use plastic with reusable materials (metal cutlery, ceramic plates) and promote beverages on tap	REN, RET
	Introduction of returnable containers to reduce waste and increase container reusability	REN, RET
	Participation in a partnership programme with Airplast for the collection and recycling of plastic packaging used for goods, with consequent reintroduction into the production chain as recycled plastic film	RET, OPO, HAN
	Participation in the ReVending project for the separate collection and recovery of cups and stir sticks from beverage vending machines	RET



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