

SUSTAINABLE VALUE CHAIN MANAGEMENT POLICY

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INTRODUCTION

The management of the value chain is recognised as a fundamental strategic element for achieving the Group's sustainability goals and for creating shared value in the medium to long term. In light of the evolution of the European regulatory framework and the increasing strengthening of ESG expectations, this Policy has been defined with the aim of preventing, mitigating, minimising, and, where necessary, remedying or ending any actual or potential negative impacts on human rights and the environment connected with the activities of its value chain.

This Policy complements the Ethical Code, the Code of Conduct for Responsible Supply Chain Management, and the Sustainability Plan, representing a formal commitment by the Organisation to the responsible and sustainable management of relationships with key suppliers, technology vendors, customers, and relevant business partners. It defines the principles, guidelines, and reference requirements to guide the evaluation, selection, and monitoring processes within the value chain, promoting behaviours that are compliant, transparent, and consistent with respect for human rights, environmental protection, and the adoption of best ESG practices.

PRINCIPLES AND VISION IN THE VALUE CHAIN

Esprinet is committed to establishing and maintaining mutually beneficial, long-lasting relationships based on a partnership approach with third parties throughout the entire value chain, both upstream and downstream, with the aim of developing a shared path for creating sustainable value, based on the following general principles:

- **Respect for human rights and international labour standards:** adherence to the principles of the United Nations Universal Declaration of Human Rights, the core Conventions of the International Labour Organisation (ILO) and the OECD Guidelines for Multinational Enterprises, with a particular focus on the elimination of all forms of forced and child labour, the protection of freedom of association and collective bargaining, the principle of non-discrimination, and the guarantee of dignified, fair, and safe working conditions;
- **Health and safety protection at work:** promotion and dissemination of high health and safety standards in the workplace across the entire supply chain, through the adoption of measures aimed at preventing accidents and occupational diseases;

- **Environmental protection, climate change mitigation, and the promotion of the circular economy:** adoption of practices and behaviours focused on reducing greenhouse gas emissions, responsibly managing natural resources, minimising waste production, and promoting the reuse, recycling, and recovery of materials, in line with the principles of the circular economy and the objectives of the Paris Climate Agreement. In this context, Esprinet ensures that the products it distributes fully comply with the applicable European regulations, including the REACH Regulation on chemicals, the RoHS Directive on the restriction of hazardous substances in electrical and electronic products, the WEEE Directive on the management of waste electrical and electronic equipment, and the ecodesign requirements;
- **Integrity, ethics, transparency, and legality:** adoption of behaviours based on high standards of integrity and fairness, rejecting all forms of corruption, extortion, conflicts of interest, or other illegal conduct, as well as compliance with current regulations in areas such as taxation, competition, intellectual property protection, personal data protection, and privacy, in tender procedures, procurement contracts, and, more generally, in all business relationships;
- **Collaboration, innovation, and sustainable development of the supply chain:** promotion of long-term collaborative relationships with suppliers and partners, fostering technological innovation, the search for sustainable solutions, and the sharing of knowledge, skills, and best practices;
- **Measurement, monitoring, and improvement of suppliers' sustainability performance:** implementation of processes for evaluating and monitoring the ESG performance of suppliers, with the aim of promoting a structured path for continuous improvement, responsibility, and accountability throughout the entire value chain.

SCOPE OF APPLICATION

This Policy defines the scope of application for the responsible management of the Group's value chain and applies to all processes related to the procurement, distribution, and sale of products and services offered. Specifically, it pertains to the upstream value chain, referring to the purchase of technological products, hardware and software, cloud services, ICT solutions, and consumer electronics, as well as the downstream value chain, concerning distribution and sales activities directed towards customers.

Given the specific nature of its business model, the Group operates in a context characterised by a high concentration of suppliers, comprising a limited number of large global partners that manufacture goods for resale, as well as a concentration, although smaller, of customers, primarily consisting of large-scale retail operators and large specialist retailers.

In light of these characteristics, this Policy applies to the entire value chain, with reference both to large suppliers and smaller suppliers, as well as to the Group's key customers, with differentiated implementation methods based on their economic, operational significance and the associated risk profiles.

As a priority, this Policy applies to strategic suppliers and key customers that, due to their economic weight and potential impact, significantly affect the Group's performance and sustainability profiles along the value chain. In this context, the main upstream and downstream groups of the value chain are identified as follows:

- **Primary suppliers (strategic suppliers and global partners):** include the main consumer electronics producers, represented by global technology leaders, who together account for approximately 70%¹ of the Group's total procurement expenditure;
- **Key customers:** include larger customers, such as large-scale retail and large specialist retailers in consumer technology products, representing about 30%² of the turnover from the sale of such products.

Regarding **smaller suppliers** and non-strategic partners, the Policy is applied using a proportionate approach, specifically aimed at ensuring the dissemination and understanding of the behavioural norms and sustainability principles adopted by the Group. In this context, Esprinet implements a direct and proactive monitoring system that includes, among other things, the signing of the Supplier Code of Conduct as a contractual prerequisite and, where applicable, the request for supporting documentation (e.g. SA8000 certifications, BSCI, ISO 45001, or equivalent certifications).

Through this approach, the Group ensures that the principles and commitments defined by this Policy are applied both in relationships with key customers and strategic suppliers, and,

¹ This figure is based on the level of expenditure on suppliers in 2025. This figure, and the individual entities it comprises, will be reassessed annually, based on fluctuations in the Group's spending.

² This figure is based on the 2025 turnover level. This figure, and the individual entities it comprises, will be reassessed annually based on fluctuations in the Group's sales.

proportionately, with smaller suppliers, ensuring a consistent and progressive oversight of sustainability profiles throughout the entire value chain.

OBJECTIVES AND ACTIONS

Through the involvement of primary suppliers and key customers, Esprinet is directly connected to the value chain upstream, including the manufacturing and raw material extraction sectors, and downstream, covering large-scale retail, specialist stores, and end users. In this context, the Group pursues the objective of preventing, mitigating, minimising, and, where necessary, remedying or halting the actual or potential negative impacts on human rights and the environment related to its activities along the entire value chain.

Regarding these priority stakeholders, Esprinet adopts a structured approach to verify and monitor sustainability practices already implemented, in line with the principle of proportionality. These operators, due to their size, high reputational exposure, and publicly committed obligations, have developed or are in the process of developing due diligence systems along the value chain, including social audit programmes, third-party certifications, and mechanisms for transparent reporting regarding working conditions and environmental impacts.

To achieve the aforementioned objectives, Esprinet implements the following actions for oversight and monitoring in the area of human rights and the environment:

- acquisition and analysis of sustainability documentation made publicly available by suppliers and partners (such as Sustainability Reports, Supplier Codes of Conduct, internal and third-party audit results);
- verification of the existence and adequacy of formal policies concerning human rights and working conditions along the value chain;
- monitoring of any relevant disputes, reports, or non-compliance issues that have arisen publicly;
- maintaining continuous and structured dialogue with key suppliers and customers, aimed at monitoring the evolution of adopted practices and promoting mutually beneficial relationships focused on continuous improvement.

REGULATORY AND DOCUMENTARY REFERENCES

This Policy is part of the regulatory and value-based framework adopted by Esprinet S.p.A. and the Group, based on a coordinated set of publicly available governance policies and tools. In particular, this policy is grounded in the Group's Ethical Code, the Code of Conduct for Responsible Supply Chain Management, the Organisation, Management, and Control Model pursuant to Legislative Decree No. 231/2001, the Sustainability Report, and the Annual Integrated Report.

At the international and regulatory level, the Policy is inspired by:

- Human rights and labour: United Nations Universal Declaration of Human Rights (1948); Fundamental Conventions of the International Labour Organisation (ILO); United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Sustainable development and corporate responsibility: United Nations Sustainable Development Goals (SDGs) - 2030 Agenda; Ten Principles of the United Nations Global Compact (UNGC); OECD Guidelines for Multinational Enterprises (2011).
- International sustainability standards: ISO 20400:2017 - Sustainable Procurement; ISO 26000:2010 - Social Responsibility Guidance.
- European regulations on sustainability and product safety: Directive (EU) 2022/2464 - Corporate Sustainability Reporting Directive (CSRD); Proposal for a Corporate Sustainability Due Diligence Directive (CSDDD); Regulation (EC) No. 1907/2006 (REACH); Directive 2011/65/EU (RoHS II); Directive 2012/19/EU (WEEE); Directive 2009/125/EC (Ecodesign); Regulation (EU) 2023/1542 on batteries; Directive (EU) 2019/1937 (Whistleblowing).
- Other international references and best practices: Paris Agreement on Climate Change (2015); UN Global Compact Network Italy Whitepaper - 'Sustainable Management of Supply Chains: Responsibility and Opportunities for Businesses' (2022).