



ETHICAL CODE

COD.ET.





ETHICAL CODE

1) INTRODUCTION

1.1) Nature of the Code The Code is an official document of the Company, approved by the Management, which collects the principles and behavioral rules in which the Company reflects itself, for the purposes referred to in paragraph 1.3 and defines the general discipline to which all those who operate in the corporate context and with the Company are subject.

1.2) Prescriptive Content The Code recognizes legal relevance and binding effectiveness to the ethical principles and behavioral standards described, also with a view to preventing corporate crimes. Violation of the principles set out in the Code compromises the trust relationship between the Company and the offender, and is pursued incisively, promptly, and immediately, through appropriate and proportionate disciplinary and/or commercial procedures, regardless of the possible criminal relevance of the behaviors adopted and/or the initiation of criminal proceedings where a crime occurs.

1.3) Purpose The primary purpose of the Code is to declare and disseminate the values and behavioral rules to which the Company intends to constantly refer in the exercise of its entrepreneurial activity. It specifies the duties of loyalty, fairness, equality, diligence and contributes to ensuring that the activities of all subjects are carried out in compliance with the values of confidentiality, transparency, professionalism, as well as in compliance with ethics and current laws. Quality and Passion make the difference: we want to serve our customers well, delivering them high-quality products according to their specifications within the requested timeframes, paying attention to cost containment and always seeking better solutions, including for environmental protection.

1.4) Recipients The recipients of this Code are:

- The Personnel (i.e., employees, any agents, quasi-subordinate workers, and coordinated and continuous collaborators, etc.) of the Company;
- Suppliers of goods and processing;
- Consultants and service providers, including professionals, and anyone who carries out activities in the name and on behalf of the Company or under its control;
- Shareholders and the Administrative Body;
- Any subject who exercises, even de facto, the powers of representation, decision-making, and/or control within the Company.

1.5) Information The aforementioned recipients of the Code are invited to observe and respect its principles and to comply with its behavioral rules. Knowledge and compliance with the provisions of the Ethical Code represent an indispensable requirement for establishing and maintaining collaborative relationships with third parties, towards whom the Company undertakes to disseminate all related information, in a context of absolute transparency. The Company undertakes to establish business relationships transparently and ethically and to maintain commercial relationships with subjects who respect the laws and regulations in force and who, more generally, demonstrate their integrity in business.

2) IMPLEMENTATION OF THE CODE

2.1) Adoption and Entry into Force The Code comes into force on the date of its approval by the Company's Management.

2.2) Internal and External Dissemination To acquire binding force, the Code is:



- Shared within the Company, through publication on company notice boards and delivery to all workers;
- Disseminated to consultants, suppliers, and customers through paper information; Copies of this Code will always be available and consultable at the administrative manager. All the subjects indicated above as recipients of the Code are therefore required to know the content of the Ethical Code, to observe it, and to contribute to its implementation.

2.3) Updates The right to modify, integrate, update the Code, subject to approval by the Management, periodically or at any time, remains reserved, giving immediate communication and information to the subjects required to apply it. The edition and date of the same are reported in the Code.

3) BUSINESS ETHICS

The Company undertakes to provide clear and transparent information and carries out its activities aligning with the highest standards of integrity, loyalty, and transparency; it inspires its choices and behavioral norms to the ethical principles and values recalled below, which configure the company policy. The Company contributes to the dissemination and awareness of Social Responsibility and Work Ethics issues, is inspired by the principles of the SA8000 standard, and does not resort to child or forced labor.

3.1) Fairness and Transparency The Company ensures that all subjects operating within it comply with the principles of fairness and loyalty in the performance of their functions, both internal and external, also for the purpose of maintaining the Company's image and the trust relationship established with customers and, in general, with third parties. The Company ensures the management of human resources in full compliance with the relevant CCNL, the Workers' Statute, and, in general, the current legislation; it does not tolerate any form of exploitation of workers and guarantees the fulfillment of the wage, contributory, and fiscal obligations provided for by labor legislation.

The company, respecting the principle of transparency, commits to disseminating correct, truthful, and complete information to Third Parties and also commits to not disclosing news of acts and measures before they are formalized and communicated to the interested parties. The Company promotes maximum transparency in accounting management and observes the rules of correct, complete, and transparent accounting, in strict compliance with the relevant regulations and applicable accounting principles. To this end, the Company ensures that any operation or transaction is promptly tracked and recorded, as well as authorized and verifiable, in addition to being legitimate and appropriate. Complete archiving and traceability of all accounting documentation, including evidence supporting each operation, is ensured to allow easy accounting registration and accurate reconstruction of the operation.

3.2) Fairness and Equality The Company is attentive to developing a corporate spirit of belonging and condemns any form of discrimination and/or abuse both in internal and external relationships. To this end, the Company ensures that none of its members engage in discrimination based on age, gender, nationality and ethnicity, political opinions, religious beliefs, sexual orientation, health status, and any other personal or social factor; it prohibits any form of harassment and behavior that may be harmful to the dignity and psychophysical integrity of the person and promotes the organization of meetings and/or events aimed at developing group spirit among members, mutual knowledge, and respect. The Company is committed to creating a stimulating work environment, respectful of the rights and freedoms of all workers, with the aim of promoting professional growth and collective well-being. The company adopts equal opportunity criteria from the selection of personnel without any discrimination and guarantees fair remuneration for everyone. Freedom of association is guaranteed.

3.3) Diligence and Professionalism The subjects operating within the Company, or those to whom the Company entrusts the performance of certain services, are equipped with proven competence, professionalism, and experience. With particular reference to its personnel, the Company takes care of



their selection, training, updating, and professional growth. The Company ensures that its personnel perform their duties with the necessary diligence and accuracy, in compliance with the directives issued by the managers and, in general, with the company's quality standards.

3.4) Health and Safety Protection in the Workplace In compliance with the legal provisions for the protection of physical and moral integrity, the Company ensures its personnel dignified working conditions, in safe and healthy work environments; it does not engage in any relationship with third parties who do not demonstrate compliance with health and safety regulations in the workplace. The safety of workplaces is recognized as a fundamental right of its workers and anyone accessing the company. To this end, the Company adopts all the most appropriate measures to assess and reduce the risks associated with carrying out its activities, always taking into account the degree of technological evolution. Each worker of the company must contribute to maintaining a safe work environment, both by observing all safety and prevention measures defined by the company and by adopting responsible behaviors: being under the influence of alcohol or drugs during work performance and in the workplace will be considered irresponsible behavior and a conscious assumption of the risk of jeopardizing the safety of the work environment.

3.5) Honesty in Business The company prohibits any conduct aimed at altering and/or counterfeiting trademarks, distinctive signs, designs, and models and ensures that all information subject to industrial and intellectual property rights is used only for permitted purposes and prohibits its disclosure. All Recipients, without exception, are invited to protect industrial and intellectual property and always promote its correct use in a legitimate and responsible manner. The company's personnel commit to avoiding pursuing illegal or illegitimate purposes, or generating conflicts of interest with clients or suppliers, in any capacity, to obtain an undue advantage, for themselves or Third Parties; they must adopt a correct and honest attitude, both in the performance of their duties and in relations with all members of the Company. In no case can the interest or advantage of the Company induce and/or justify dishonest behavior.

3.6) Fair Competition In compliance with national and EU Antitrust regulations, as well as the guidelines and directives of the National Competition Authority, the Company cannot engage in behaviors, nor enter into agreements with other Companies that may negatively influence the competition regime among the various reference operators, favoring business to its advantage.

3.7) Confidentiality and Privacy Protection The Company pays particular attention to the implementation of the provisions regarding the protection and safeguarding of personal data of its collaborators and third parties with whom it comes into contact, as well as all information related to the company's activities in conducting its business. Each collaborator of the Company is required not to use, nor publicize by any means, confidential information and data except within the limits and in function of the exercise of their competences.

3.8) Fight Against Corruption and Money Laundering The Company firmly condemns any act or action carried out in activities involving the receipt, laundering, and use of goods or proceeds from criminal activities. The Company does not tolerate any form of corruption and imposes on anyone representing or acting on behalf of the Company to refrain from engaging in corruptive behaviors. In particular, no form of gift, homage, or benefit that can be interpreted as exceeding common courtesy practices, or in any case aimed at obtaining favorable treatment in the conduct of activities attributable to the Company itself, is allowed. Even in relations with its clientele, no payments that are not strictly derived from the contract can be accepted, nor can payments be accepted from a subject other than the contractual counterpart. The acceptance of gifts or benefits granted in the form of money is always prohibited.

3.9) Environmental Protection The Company contributes to the dissemination and awareness of environmental protection issues and manages the activities entrusted to it in an eco-compatible manner, recognizing the importance of environmental protection and safeguarding with a view to waste



containment, pollution, and waste production; it promotes proper waste separation, seeks suppliers who can guarantee products with recycled materials, and is attentive to the consumption of water and energy resources.

3.10) Clients, Quality of Services and Products The Company pays particular attention to the satisfaction of its Clients, their requests, and expectations, with the aim of providing, in its sector of activity, increasingly competitive products and services with a guarantee of maximum professionalism and flexibility, in full collaboration and respect for the values of loyalty and transparency.

The Company is careful to provide its clients with clear and transparent information regarding processing methods and to avoid transmitting misleading information.

3.11) Suppliers The Company establishes relationships of mutual loyalty and collaboration and requires that suppliers also operate in compliance with all applicable laws. The Company establishes relationships only with suppliers who are reputable from a reputational standpoint and who are engaged in lawful activities. The selection of suppliers and the determination of purchase conditions are based on objective criteria for evaluating the quality of the goods or services purchased, the price, and the ability to guarantee the highest standards in the goods or services purchased. Even in relationships with suppliers, there is an absolute prohibition on giving, receiving, or promising gifts, benefits, or other utilities aimed at receiving favorable treatment for any corporate activity, except for utilities of modest value attributable to normal courtesy practices.

4) Final Provisions

4.1) Interpretation Any interpretative conflicts between the principles and contents of the Company's procedures and the Ethical Code must be favorably resolved in favor of the latter. In any case, the Management takes care of defining any issues regarding the interpretative and applicative aspects of the Code.

4.2) Ethical Code Manager The Management has identified Mr. David Ragionieri within its ranks as responsible for the application and updating of the Ethical Code.

4.3) Reporting Anyone wishing to report possible violations or problems regarding the Ethical Code is invited to contact the Ethical Code Manager directly or to write a letter, even anonymously, in a sealed envelope addressed to the same Ethical Code Manager at the company headquarters.

Arezzo, April 3, 2025

The Management