

 <b>DONDI</b> HOME	<b>CODE OF ETHICS AND CONDUCT</b>	<i>Rev: 00</i>	<i>Approved on: 28/10/2024</i>
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# DONDI

HOME

## **CODE OF ETHICS AND CONDUCT**

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*Approved on 28/10/2024 by resolution of the Board of Directors*

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## GENERAL PROVISIONS

### PURPOSE OF THE SVAD DONDI S.p.A. CODE OF ETHICS AND CONDUCT

SVAD DONDI, with nearly 60 years of experience, creativity, entrepreneurial spirit, and a love for elegance and quality, has evolved from a family-run workshop founded by Anna and Alfredo Dondi into a major company that perfectly blends mass production with artisanal craftsmanship. From sponges to cushions, SVAD DONDI's production, thanks to a continuous infusion of new ideas, has evolved with the awareness that the future would be in textile furnishings and coordinated sets: luxurious linens, dreamy quilts, warm duvets, couture, and design for the contemporary home. In SVAD DONDI collections, the constant effort is to always keep a finger on the pulse of new trends, thanks to a formidable staff of stylists, technicians, and marketers. The company observes the world and its aesthetic impulses, translating them into precious and perfect products. Great attention has always been paid to the research of the highest quality materials and to craftsmanship, a unique sartorial know-how. In this perspective, the collaboration with the great fashion house BLUMARINE has achieved great success in the sector. In addition to this, DONDI has always paid the utmost attention to presentation - great photographers, exclusive settings, refined packaging, advertising - the attention to detail follows all phases up to the final customer, always impeccable. Over the years, many lines have come and gone to follow trends and new lifestyles, now consolidated into five important and targeted segments. DONDI, BLUMARINE HOME COLLECTION, BLUMARINE BABY, BLUMARINE ART-DE-LA-TABLE, are periodically launched at the most prestigious international fairs and, above all, are present in high-end home furnishing stores. SVAD DONDI is a brand with its antennae tuned to the tastes of the collective imagination to create unique, exciting, and magical products.

One of SVAD DONDI S.p.A.'s primary objectives is to achieve and maintain lasting competitive positions while safeguarding the basic values and principles of the company's founder, which are now the heritage not only of the ownership but of all the people who work there.

The Company adopts, both internally and externally, a set of behavioral rules aimed at disseminating, at all levels of the company, a solid ethical integrity and a strong respect for the laws that, for the achievement of business objectives, are of central importance for the proper conduct of its activities.

Therefore, this document (hereinafter referred to as the "**Code of Ethics and Conduct**" or, for brevity, the "Code") has been approved by the Company's Board of Directors, in accordance with the best corporate governance, on the premise that its observance is an essential condition for the proper functioning of the Company, for the protection of its reliability and reputation and for

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ever greater customer satisfaction, factors which contribute to determining the success and future development of the Company itself.

SVAD DONDI imprints all its actions, operations, relationships, and transactions undertaken in the management and operation of its various business activities with the principles and values of this Code.

In particular, SVAD DONDI aims to:

- maintain and sustain a profitable and sustainable business management based on ESG (Environmental, Social & Governance) criteria by adhering to the highest international standards in terms of environmental protection and climate responsibility;
- guarantee an ever-increasing quality of its products and efficient production, thanks to continuous research and development activities that can conform to the needs of customers and the context in which it operates;
- motivate, raise awareness, and value personnel as important authors of the company's quality and innovation (periodic training courses, meetings, and work groups);
- seek the best solutions to reduce the environmental and climate impact of the production process, commit to respecting the territory in which it operates, and involve personnel to create a greater awareness of environmental and climate respect;
- pay attention to and value its human resources, supporting their professional growth based on merit.

The Company is aware of belonging to a value chain in which prejudicial impacts on human rights, climate, and the environment may occur, and intends to work to guarantee its customers, engaged in sustainability paths, its full adherence to the behavioral principles defined by them. To this end, it undertakes to structure a process for the periodic verification of the content of the Ethical Codes disseminated by customers and subsequently updated by them, as well as the integration of any additional behaviors in its own Code of Ethics and Conduct or, in any case, the alignment of its Code with such Codes, which is disseminated internally and to sub-suppliers.

## SCOPE OF APPLICATION AND RECIPIENTS

With this Code of Ethics and Conduct, SVAD DONDI defines, in **Section I**, the **Ethical Principles** that must inspire its activities, with the aim of spreading a solid ethical integrity and a corporate culture sensitive to respecting the laws in force in the contexts in which it operates. The commitment to the Principles refers to the Company's Stakeholders, which, in accordance with the 10 Principles of the UN Global Compact, are identified in the following categories:

- Shareholders and investors
- Employees, Agents, and collaborators

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- Customers and final consumers
- Distributors and commercial partners
- Suppliers and their workforce
- Competitors
- Public authorities
- Local communities and the environment

The implementation and credibility of the Ethical Principles require consistency between what is declared, on the one hand, and the behaviors that are put into practice, on the other, that is, the actions that make the principles operational. To this end, the company defines, updates, and disseminates specific Policies as well as, in Section II of this Code, behavioral obligations and prohibitions aimed at:

- defining a set of values and rules of conduct to be respected and implemented in the conduct of business and in relations with customers, suppliers, employees, collaborators, competitors, the community, and the environment, as well as in the organization and management of the Companies, in order to create an effective system of control of activities so as to ensure the prevention of the commission of crimes (e.g., for Italy, the model pursuant to Legislative Decree 231/2001 applies). No business activity or operation may result in conduct that violates the applicable legislation.
- maintaining and supporting a profitable and sustainable business management, based on ESG (Environmental, Social & Governance) criteria, through adherence to the highest international standards in terms of environmental protection and human rights, and contributing to the reduction of negative impacts from an ESG perspective through the selection of suppliers in line with such criteria, all while providing adequate information, prevention, and control tools, and also intervening with appropriate corrective measures and/or sanctions.

**Section II** of this Code of Ethics applies to SVAD DONDI in Italy and, moreover, to all those who:

- i) hold representative, administrative, or managerial positions or exercise, even de facto, the management and control of the company or a division thereof (hereinafter referred to as "**Top Management**");
- ii) belong to the employee personnel of SVAD DONDI companies, including fixed-term or part-time workers and workers equated to them (hereinafter referred to as "**Employees**");
- iii) directly or indirectly, permanently or temporarily, collaborate with SVAD DONDI (including, but not limited to, consultants, suppliers, agents, representatives, intermediaries, etc.) and anyone who, in various capacities, has business relationships with the Company (hereinafter referred to as "**Suppliers**").

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For the purposes of this Code of Ethics, Section II, Top Management, Employees, and Suppliers are hereinafter collectively referred to as "**Recipients**". Recipients are therefore required to know the provisions of the Code of Ethics, Section II - **to the extent and insofar as it applies to each of them** - obliged to observe the principles contained therein and subject to sanctions for violation of its provisions, as well as called to actively promote its observance.

SVAD DONDI expects and requires that the behavior of all Recipients is in line with the provisions of this Code of Ethics, Section II. To this end, SVAD DONDI is committed to ensuring the widest possible dissemination of the Code of Ethics to all its Recipients - as defined above - and to the public at large, including through its inclusion on the Company's website ([www.dondi.it](http://www.dondi.it)), as well as to enforcing the ethical principles and behavioral rules defined in this Code of Ethics on all its suppliers and collaborators, also through the constant updating and increasingly widespread dissemination and implementation of the Code itself.

## ADOPTION, DISSEMINATION, AND AMENDMENT OF THE CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct shall enter into force on 28/10/2024, the date on which it was approved by the Company's Board of Directors. Any amendments and/or updates shall be approved by the same corporate body and promptly communicated to the interested parties. The Company has mandated the Top Management to disseminate this Code of Ethics and Conduct to inform the Recipients and all other parties who, in any capacity, have relationships with the Company, through the most appropriate communication or dissemination activities (publications, communications, conferences, educational activities, and any other means deemed suitable for this purpose), such as through publication on the Company's website ([www.dondi.it](http://www.dondi.it)) or by including a specific contractual clause in the contracts that the Company enters into with its Suppliers and with its Employees at the time of hiring. SVAD DONDI requires that all Recipients and any other party who, in any capacity, has relationships with the Company, have adequate knowledge of the provisions of this Code of Ethics and Conduct, Section II, and that they strictly comply with them. It is understood that SVAD DONDI does not intend to initiate or continue any collaborative relationship with those who have not undertaken the commitment to comply with the provisions of this Code, Section II, or who have intentionally or unintentionally violated its provisions.



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## SECTION I – ETHICAL PRINCIPLES

At the heart of SVAD DONDI's strategic choices and operational behaviors are the following shared Ethical Principles:

- **Legality**
- **Equality and impartiality**
- **Transparency, fairness, and reliability**
- **Professionalism**
- **Confidentiality**
- **Value of human resources**
- **Health and safety**
- **Environmental protection, climate change, and conduct principles in the sourcing of raw materials, particularly animal species**
- **Competition protection**
- **Intellectual and industrial property protection**
- **Risk-based information protection and security**

### I.1. LEGALITY

SVAD DONDI considers compliance with national and international laws and regulations a prerequisite for conducting its business and maintaining the success and trust of its various stakeholders. The Company therefore undertakes to promote behaviors marked by strict adherence to the laws and regulations in force in the various contexts in which the Company operates, in order to avoid the commission of crimes and any other type of wrongdoing.

### I.2 NON-DISCRIMINATION AND IMPARTIALITY

SVAD DONDI protects and promotes respect for human dignity, which must not be discriminated against on the basis of age, sex, sexual orientation, personal and social conditions, race, language, nationality, political and union opinions, and religious beliefs. This form of respect for social requirements is promoted with reference to, among others, the principles expressed in the SA 8000 standard, the main international agreements (ILO) on workers' rights, especially in the area of child labor, and the main requirements in terms of social responsibility, environmental respect, and professionalism, or similar standards. Consequently, discriminatory behavior is not tolerated in hiring, remuneration, training, access to the Company's facilities, working conditions, and in any other area. Recipients are required to actively collaborate to maintain a climate marked by maximum cooperation, as well as respect for the dignity and skills of each individual.

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**In managing various social activities and in all related decisions, the individuals to whom this Code of Ethics applies must act with impartiality in the best interest of the Company, making decisions with professional rigor and objectivity based on objective and neutral evaluation criteria, in accordance with the company's ethical principles outlined in this Code of Ethics and Conduct.**

### **I.3. TRANSPARENCY, FAIRNESS, AND RELIABILITY**

Actions, operations, negotiations, and, more generally, the behavior of those subject to this Code of Ethics and Conduct shall be guided by the utmost transparency, fairness, and reliability. In the management of activities, information provided must be transparent, truthful, complete, and accurate, and all actions and operations must be duly authorized and properly recorded, as well as verifiable, legitimate, consistent, and adequately documented in order to allow, at any time, verification of the related decision-making, authorization, and execution process.

### **I.4. PROFESSIONALISM**

The Company values professionalism as an indispensable asset for its growth and affirmation in national and international markets. Therefore, SVAD DONDI promotes the conduct of social activities on the basis of professionalism, commitment, and diligence appropriate to the nature of the tasks and responsibilities assigned to each individual.

### **I.5. CONFIDENTIALITY SVAD DONDI**

recognizes confidentiality as an essential rule of conduct. The Company therefore ensures the confidentiality of information, in the strictest compliance with the legislation in force on the protection of data and personal information.

### **I.6. VALUE OF HUMAN RESOURCES**

Human resources represent an indispensable and precious asset for the existence and future development of SVAD DONDI. In order to enhance the skills and competencies of each individual, merit-based criteria are adopted and equal opportunities are guaranteed to all. Human resource management aims at improving and increasing the capabilities of each individual, also through training and updating activities, always keeping this Code of Ethics and Conduct as a fixed point. Working conditions are guaranteed to help employees carry out their duties in a climate of cooperation, respect, and serenity. In order to guarantee full respect for the individual, the Company, in each of the contexts in which it operates, combats child labor, refraining from any

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form of exploitation thereof in compliance with the provisions of the International Labour Organization (ILO), and in particular...with conventions aimed at eliminating child labor and abolishing slavery, forced labor, and compulsory labor, SVAD DONDI guarantees its employees a workplace free from any form of harassment, intimidation or violence, mental or physical coercion, or bullying, and prohibits any behavior that could lead to an intimidating, hostile, or offensive work environment. Additionally, SVAD DONDI recognizes the right of its employees to form, be involved in, or join unions and/or industrial organizations that defend and promote their interests. The Company also guarantees - and requires its suppliers to comply with - collective bargaining agreements, freedom of speech, and the protection of employee representatives. No form of retaliation may result from the exercise of this right. The Company is committed to maintaining an open and constructive dialogue with union representatives and all employees

## **I.7. HEALTH AND SAFETY**

SVAD DONDI is committed to providing and maintaining safe and healthy working environments in compliance with all applicable labor protection and accident prevention regulations, both at the workplace and during business trips, in order to guarantee the physical and moral integrity of its employees and collaborators.

The Company promotes a safety culture and awareness of the risks associated with work activities among all its employees and collaborators, requiring everyone, at all levels, including suppliers, to behave responsibly and respect the safety system in place and the company procedures that form part of it. Employees, collaborators, and any other person who, in any capacity, accesses the Company's facilities is called upon to contribute personally to maintaining the safety and quality of the work environment in which they operate.

Employees and collaborators contribute to the process of risk prevention and protection of health and safety for themselves, their colleagues, and third parties, without prejudice to individual responsibilities under applicable laws.

They must also maintain a climate of mutual respect for each other's dignity, honor, and reputation, also respecting the existing organization within the company.

## **I.9. COMPETITION LAW COMPLIANCE**

Recognizing that a healthy and fair competitive system contributes to the best development of its business mission, SVAD DONDI complies with the competition laws in force in the contexts in which it operates and refrains from engaging in or encouraging behaviors that may constitute unfair competition.

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## **I.10. PROTECTION OF INTELLECTUAL PROPERTY**

In implementation of the principle of compliance with the law, the Company ensures compliance with domestic, EU, and international regulations for the protection of industrial and intellectual property.

Recipients shall promote the correct use, for any purpose and in any form, of trademarks, distinctive signs, and all creative works, in order to protect the author's moral and economic rights.

## **I.11. RISK-BASED INFORMATION SECURITY**

The company implements information security control systems within the organization with particular attention to the corporate IT world, i.e. the processes supporting all the company's businesses. It recognizes confidentiality, integrity, and availability as the fundamental requirements for information security.

Confidentiality, or privacy, is the ability to prevent information from being accessed by individuals or resources without explicit authorization, to be achieved through user authentication and appropriate access restrictions.

Integrity is the condition of ensuring that information is unaltered and consistent, to be achieved by ensuring adequate storage and transmission measures and preventing unauthorized access.

Availability means that information is readily accessible when needed, to be guaranteed by information processing and transmission systems that always function correctly.

Any type of data that affects personal information follows the GDPR legislation in the EU and the applicable legislation in other involved countries.

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## SECTION II – CODE OF CONDUCT

### CHAPTER I – ENVIRONMENTAL PROTECTION

#### I.1. LOCAL ENVIRONMENTAL IMPACT

All local and international laws and regulations concerning the protection and preservation of the environment and local communities must be respected, for all environmental matrices, including, but not limited to, those concerning noise impact, asbestos, etc.

It is mandatory to hold all necessary authorizations and environmental licenses relevant to the activities carried out and to provide the communications required by the Public Administration.

An environmental management system inspired by international industry principles and standards must be adopted.

It is mandatory to adopt policies aimed at promoting activities and processes that are as compatible as possible with the environment and climate, through the use of advanced criteria and technologies in the field of environmental protection, energy efficiency, and sustainable use of resources, preferably making use of the best available technologies (i.e. BAT).

Company production policies must aim at the concept of a circular economy, the prevention of soil, water, and air pollution, and must be implemented through procedures that are adequate for the purpose.

Collaboration must be sought with all those who carry out their activities, in any capacity, in and for the company or the Supplier or with respect to any company controlled and/or participated in by the latter, to optimize the management of environmental issues and climate change. The pursuit of ever higher standards of protection must be achieved through the implementation of adequate management and monitoring systems for the entire value chain.

Production facilities must be built or converted in such a way as to ensure their harmonious integration into the local context, whether natural or man-made, and in compliance with local laws and regulations and international treaties.

It is mandatory to comply with environmental legislation and to implement preventive measures to avoid or at least minimize environmental impact with reference, in particular, to water use, waste management, air emissions, and the use of energy resources.

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In particular, it is necessary to:

- reduce the impact of climate change by reducing greenhouse gas emissions, with relevant activities along the entire value chain;
- adopt measures aimed at limiting and - if possible - eliminating the negative impact of economic activity on the environment, not only when the risk of harmful or dangerous events is demonstrated (preventive action principle), but also when it is uncertain if and to what extent the company's activities pose risks to the environment (precautionary principle);
- prioritize the adoption of measures aimed at preventing potential environmental harm, rather than waiting to repair damage that has already occurred;
- promote the values of training and sharing the principles of the code among all individuals involved in the company, whether at a senior or subordinate level, to ensure they adhere to the established ethical principles, especially when making decisions and subsequently when implementing them;
- promote activities and processes as compatible as possible with the environment, through the use of advanced criteria and technologies in environmental protection, climate change mitigation, energy efficiency, and sustainable resource use;
- ensure sourcing of raw materials and energy from areas not protected by national laws or international conventions, and exclusively through suppliers committed to safeguarding environmental resources and the 10 Principles of the UN Global Compact;
- assess the environmental impacts of all activities and business processes;
- collaborate with stakeholders, both internal (e.g., Employees) and external (e.g., Institutions and Suppliers), to optimize the management of environmental issues;
- pursue environmental protection standards through the implementation of appropriate management and monitoring systems within its supply chain;
- commit to reducing emissions and controlling the main atmospheric pollutants, as well as combating deforestation;
- manage waste in compliance with current regulations, including those regarding authorizations, registrations, or notifications required by Public Administration, ensuring process traceability and control over the value chain;
- monitor the effectiveness of measures aimed at proper management of industrial wastewater discharges, particularly those containing hazardous substances, in full compliance with current regulations;

Full cooperation with the competent Authorities must be ensured during inspections and/or controls conducted within the company.

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Finally, it is expressly forbidden to engage in behaviors that, directly or indirectly, could potentially lead to the commission of an environmental offense. Every employee or collaborator of the company or of the Supplier must contribute to sound environmental management, always operating in compliance with current regulations, and must not expose other employees or collaborators to risks that could harm their health or physical safety.

## **I.2. WASTE MANAGEMENT**

All waste, and in particular hazardous waste, must be disposed of responsibly and in compliance with applicable laws and regulations. We are committed to implementing a circular material flow at every stage of production.

The adoption and implementation of disposal procedures for all potentially hazardous waste streams must be adequately documented. Adequate storage, treatment, and recycling of hazardous waste must be provided.

Employees involved in the disposal of hazardous waste must be aware of the risks associated with such materials and act in a manner that protects themselves, third parties, and the environment from the damage that may result from such risks.

It is necessary to be able to provide at any time the documentation that certifies the final destination of hazardous waste.

In waste management activities, the Company requires compliance with the following rules of conduct:

- Prohibition of the abandonment or uncontrolled disposal of waste or the discharge of waste into surface or groundwater.
- Prohibition of keeping waste in "temporary storage" outside the requirements and time limits provided for by law.
- Prohibition of mixing waste (in the absence of any appropriate authorization).
- Prohibition of declaring false information on the nature, composition, and physicochemical characteristics of waste when preparing a waste analysis certificate or prohibition of using a false certificate during the transport of waste.
- Prohibition of the disposal of waste produced at a treatment plant that is not specifically authorized.
- Prohibition of the discharge of any type of waste, whether solid or liquid, into surface or groundwater.
- Prohibition of setting fire to waste produced by the company itself, whether inside or outside the company premises, and of setting fire to waste from third parties that is found abandoned or deposited.
- Prohibition of abandoning and/or depositing waste on which, subsequently, third parties will set fire.

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- In the event that waste from third parties is found within the Company's premises, it must be treated as waste produced internally and disposed of according to the rules governed by the relevant procedure.

In the event of an incident that could potentially contaminate a site, it is mandatory to communicate this circumstance to the competent public authorities.

## **CHAPTER II – SOCIAL\_HUMAN CAPITAL**

### **II.1. HUMAN RESOURCES**

All relevant labor legislation applicable to all personnel must be made accessible in the local language or at least in English. In particular, but not exclusively, the rules on minimum wage, overtime limits and costs, working hours, holidays, and leave must be published.

All personnel must be hired under a written contract in the local language or, in any case, in a language accessible to each employee. The recruitment process is owned and paid for by the company.

To protect illiterate employees, it is necessary to inform these employees, in appropriate ways and forms, of the personnel policies, the provisions of the employment contract, and the methods of calculating their salary.

It is strictly forbidden to:

- Recruit labor for the purpose of assigning it to work for third parties under exploitative conditions, taking advantage of the workers' state of need;
- Use, hire or employ labor, even through the intermediation activity referred to in point 1), subjecting workers to exploitative conditions and taking advantage of their state of need.

It should be noted that "exploitative conditions" should include violations of the principles/provisions listed below.



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## **II.2. CHILD LABOR**

Personnel may only be hired in compliance with the provisions of the International Labour Organization (in particular, ILO Convention No. 138 or the more stringent provisions of national legislation on child labor) and any other United Nations Convention concerning the rights of the child.

All employees from the minimum permitted age to the age of 18 must be exempted from performing hazardous activities, working overtime, and working night shifts. Furthermore, any other limitation provided for by applicable legislation for employees under the age of 18 must be considered operative.

All employees under the age of 18 must be easily identifiable through any measure useful for this purpose.

## **II.3. FORCED LABOR, COERCION, AND HARASSMENT**

It is mandatory to refrain from using any form of illegal, forced, or involuntary labor. All personnel must be treated with dignity and respect. No form of corporal punishment or psychological violence or any other abuse shall be permitted. Clear policies must be adopted on the inadmissibility of harassment and any other abuse (e.g., exploitative conduct related to working conditions, pornography, child pornography, etc.) by supervisory personnel and on the procedures that allow employees to report such incidents. It is prohibited to require monetary deposits, financial guarantees or collateral, or personal belongings as a condition of employment, and clear and transparent terms and conditions must be defined and communicated in the event of advances and loans to employees in order not to tie them to employment. Employees' right to leave the workplace during their free time must not be restricted in any way. Security personnel must not be allowed to exert pressure on employees. Employees must be free to resign in compliance with the rules governing the institution. The originals of employees' documents (identity documents, passports, and birth certificates) cannot be permanently retained by the employer. Personal data must be protected and follow the European GDPR or any other corresponding national legislation. No monetary deposits shall be required from the personnel, either at the time of hiring or throughout the duration of employment. Furthermore, it is strictly prohibited to hold, on computer or paper media, on the Company's premises or to disseminate through the Company's website or publications edited or promoted by the Company itself, pornographic material or virtual images created using images of minors under the age of eighteen. Virtual images are defined as images created with graphic processing techniques not associated in whole or in part with real situations, the quality of whose representation makes unreal situations appear real.

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#### **II.4. DISCRIMINATION**

It is mandatory to protect and promote respect for human dignity, which must not be discriminated against on the basis of age, sex, sexual orientation or gender, personal and social conditions, race, language, nationality, political and union opinions, and religious beliefs. Consequently, discriminatory behavior is not tolerated in the hiring of personnel, remuneration, training, access to the facilities of the Company or the Supplier, working conditions, and in any other area. Employees from foreign countries must enjoy the same rights as local employees. Any burden related to the hiring of foreign employees must be borne by the employer. Pregnancy tests must not be a condition of employment. Employees cannot be forced to use contraception. Employees who benefit from maternity leave for the duration determined by local laws must not be dismissed or forced to resign, must not lose their seniority or suffer reductions in their salary greater than that permitted by law, and at the end of leave must not be demoted.

#### **II.5. FREEDOM OF ASSOCIATION**

The right to form or join trade unions and the right to adhere to collective agreements within the terms permitted by local laws must be guaranteed. All employees must have the right to choose the trade union to which they belong. The trade union must be guaranteed the right to carry out its activities during working hours within the terms established by local legislation and to refrain from any form of discrimination according to the provisions of local legislation. All personnel must be guaranteed the right to express their opinion anonymously by means of a suggestion box, e-mail, or any other channel made available by the employer. A reporting system is established at each of the Company's sites.

#### **II.6. WAGES AND WORKING HOURS**

All personnel must be guaranteed at least the minimum wage provided for by sector laws or by the collective bargaining agreement applicable at the place of work, where this provides better conditions for the employee. It is mandatory to correctly calculate the salaries of employees and pay them together with an accurate payslip that allows verification. Income security, social security contributions, and any other sectoral regulatory provisions must be guaranteed in compliance with applicable legislation. Unjustified deductions from the payslip are not permitted. Employees must be paid as provided for any form of paid leave to which they are entitled. Working hours must not exceed the daily, weekly, monthly, quarterly, and annual limits provided for by law. Each employee must be guaranteed at least one day of rest per week. Overtime must be voluntary and always paid. The entire value chain is required to apply these practices.

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## **II.7. EMPLOYMENT OF THIRD-COUNTRY NATIONALS**

It is not permitted to hire or otherwise use - even through temporary work agencies - foreign workers who do not have the residence permit required by current law, or whose permit has expired and for which renewal has not been requested within the terms of the law, has been revoked, or has been annulled.

Furthermore, it should be noted that it is a criminal offense to promote, direct, organize, finance, or carry out the transport of foreigners into the territory of the State, or to perform other acts aimed at illegally procuring their entry or facilitating their stay in the territory of the State or of another State of which the person is not a citizen or does not have a right of permanent residence, if:

- The act concerns the illegal entry or stay in the territory of the State of five or more people;
- The person transported has been exposed to danger to their life or safety in order to procure their illegal entry or stay;
- The person transported has been subjected to inhuman or degrading treatment in order to procure their illegal entry or stay;
- The act is committed by three or more people acting in concert or using international transport services or forged or altered or otherwise illegally obtained documents;
- The perpetrators have the availability of weapons or explosives.

The penalty is increased if the above facts:

- Are committed for the purpose of recruiting persons for prostitution or other forms of sexual or labor exploitation or concern the entry of minors to be used in illegal activities in order to facilitate their exploitation;
- Are committed for the purpose of making a profit, even indirect.

## **II.8. DISCIPLINARY PROCEDURES**

No form of physical or psychological violence shall be permitted as a disciplinary practice. The disciplinary procedure must be made accessible to all employees in the local language or in any language that is understandable to the employees. The procedure must comply with all applicable laws and, where present, collective agreements that ensure greater protection for employees. All disciplinary actions must be carried out in compliance with applicable law, and such compliance must be guaranteed throughout the entire value chain.

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## **II.9. HEALTH AND SAFETY MANAGEMENT SYSTEMS**

It is mandatory to provide and maintain safe and healthy working environments in compliance with current legislation on worker protection and accident prevention in order to guarantee the physical and moral integrity of its employees and collaborators. Procedures must be adopted to identify and reduce risks to health and safety in the workplace. In particular, it is necessary to: avoid risks; assess risks that cannot be avoided; combat risks at the source; adapt the work to the person, especially as regards the design of workplaces, the choice of equipment, work methods, and production, also to alleviate monotonous work, repetitive work, and to reduce its effects on health; substitute what is dangerous with what is not dangerous or is less dangerous; plan the measures deemed appropriate to guarantee the continuous improvement over time of safety levels, also through the adoption of codes of conduct and good practices; give priority to collective protection measures over individual protection measures; provide adequate instructions to workers, guarantee the training and information of all those who carry out their work activities on the risks to which they are exposed, ensuring the means and personal protective equipment assessed as necessary in relation to the risk profile identified; continuously monitor the efficiency of the system to safeguard against risks related to safety, in the pursuit of continuous improvement objectives in this delicate sector, taking into account the degree of evolution of the technique. Emergency plans and specific intervention procedures must be defined on the basis of the risk assessment carried out. A qualified representative must be appointed to ensure a safe and healthy workplace for all personnel. All personnel must be trained on workplace safety through periodic drills. All personnel must be equipped with personal protective equipment and safety clothing required by sector regulations and industry standards, without any cost to the personnel. All personnel must be required to wear personal protective equipment for the entire duration of the work shift. Where there is a specific risk of eye injuries in the workplace, eye wash stations must be provided in locations that are quickly and easily accessible. Employees who operate dangerous machinery and/or who are at risk of coming into contact with high voltage must have adequate technical qualifications. In addition, SVAD DONDI recognizes that the abuse of alcohol, drugs, or other similar narcotic substances by employees can negatively affect the effectiveness of their performance and can have harmful consequences for themselves, for safety, for the efficiency and productivity of colleagues. For this reason, the improper use, possession, distribution, or sale of alcohol, drugs, and similar narcotic substances on the Company's premises is strictly prohibited.

## **II.10. EMERGENCIES AND ACCIDENTS**

It is necessary to ensure that emergency lights and alarms are fully functional. Evacuation routes and emergency exits must be kept clear and adequately marked in the local language. Firefighting equipment must be provided by the employer and required of the entire value chain. Periodic checks of fire extinguishers and other fire-fighting systems must also be provided to ensure that they are in good working order and are easily accessible and well distributed throughout the

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workplace. Environmental protection must be ensured even in emergency situations. A fire brigade must be designated and periodic fire drills must be organized in accordance with local laws. Such tests must involve all personnel and must be recorded. A list of emergency telephone numbers must be easily accessible to all employees.

## **II.11. WORK ENVIRONMENT**

The premises where the work activity is carried out must be adequate for the needs and comply with the legal provisions for the use for which they are intended. The buildings that house these premises must comply with the regulatory provisions on construction. For this purpose, a specific periodic structural check must be provided. The workplace must be adequately ventilated, clean, lit, and have a comfortable temperature. Likewise, access to potable water resources must be ensured. The existence of the above requirements must be verified periodically, with particular attention to temperature, light, noise, ventilation, and dust. An adequate number of toilets must be provided, in compliance with legal provisions. Toilets for men and women must be separate and kept clean. Wiring, electrical systems, and other devices must be adequately marked and maintained in good condition. Each machine must be equipped with a maintenance log, a declaration of conformity, and a safety manual. For hazardous machinery, protective devices and preventive measures are adopted. Out-of-use machinery must be adequately labeled to prevent its use. Risk assessment in relation to safety and the environment must be carried out whenever new equipment is purchased with risks to health, emissions into the air, wastewater, or water in general. If there is a dormitory and/or a canteen, these must comply with the applicable legal provisions from time to time.

## **CHAPTER III – GOVERNANCE**

### **III.1. REGULATORY COMPLIANCE AND MONEY LAUNDERING**

It is mandatory to hold an adequate commercial license and to keep financial accounts in accordance with national regulations and, in any case, accurately. All actions, operations, negotiations, and, more generally, any behavior to which this Code refers must be inspired by the utmost correctness, reliability, and transparency. Within the framework of these activities, information must be provided in a transparent, truthful, complete, and accurate manner. Furthermore, each of these activities must be duly authorized and correctly recorded, as well as verifiable, legitimate, consistent, and adequately documented in order to allow, at any time, verification of the relevant decision-making, authorization, and execution process.

SVAD DONDI condemns any activity that involves money laundering, i.e. the performance of operations involving proceeds from criminal activities in any form or manner, in order to concretely hinder the identification of the criminal origin.

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SVAD DONDI also intends to protect itself from the risk of purchasing goods derived from illegal activities and high-risk activities from a sustainability perspective, such as climate or energy-related risks. It is forbidden to certify regularity at the time of receiving goods/services in the absence of a careful evaluation of the merit and appropriateness in relation to the good/service received and to authorize the payment of goods/services in the absence of a verification of the appropriateness of the supply/service with respect to the contractual terms.

It is mandatory to be guided by principles of transparency in the exercise of business activities and in the choice of Suppliers, paying the utmost attention to news concerning third parties with whom the Company has financial or commercial relations that could even only generate the suspicion of the commission of a crime that is a prerequisite for the crime of Self-laundering. In any case, it is not permitted to recognize compensation in favor of External Consultants that do not find adequate justification in relation to the type of assignment to be carried out or carried out. Therefore, in no way shall it be involved in matters related to money laundering and self-laundering of money derived from criminal activities or the receipt of goods or other proceeds of unlawful origin and, in particular, propose or deliver goods derived from criminal activities committed by the same. It is therefore necessary to verify in advance the available information on commercial counterparties, suppliers, partners, collaborators, and consultants, in order to ascertain their relative respectability before establishing business relationships with them, paying the utmost attention to news concerning third parties with whom the Company has financial or commercial relations that could even only generate the suspicion of the commission of a crime that is a prerequisite for crimes related to money laundering.

It is mandatory to comply with all applicable national and international laws and regulations on combating money laundering and self-laundering, with an invitation to report to the competent Authority any operation that may constitute a crime of this nature. In particular, Top Executives and those who carry out their activities in risk areas must undertake to ensure compliance with the laws and regulations in force in every geographical context and operational area, as regards measures to limit the use of cash and bearer securities in transactions.

The transfer of cash or bearer securities is prohibited when the value of the transaction, even if fragmented, is equal to or greater than the limit provided for by law. It should be noted that any other conduct aimed at completing such a transfer is also prohibited (for example, a promise or agreement to transfer, etc.)

Know Your Customer is an essential condition for preventing the use of the SVAD DONDI production-financial system for money laundering purposes, as well as for assessing any suspicious transactions.

In any case, it is absolutely forbidden to maintain relationships with subjects (natural persons and/or legal entities) whose membership in criminal organizations or who operate outside the law



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is known or suspected, such as, by way of example but not limited to, subjects linked or otherwise attributable to the environment of organized crime, money laundering, drug trafficking, usury, receiving stolen goods, and the exploitation of labor.

### **III.2. COMPLIANCE WITH TAX CRIME PREVENTION**

Declarations, liquidations, and any other mandatory communication for tax purposes must be made and submitted in accordance with the methods and deadlines provided for by the applicable regulations. The Company and Employees, within the scope of their respective duties and roles, are responsible for the constant updating and receipt of legislative innovations, official practices, and OECD guidelines on tax matters insofar as they are relevant. Internal information and training on tax matters must be promoted and the widest possible dissemination and knowledge of the policies/procedures adopted by the Company to comply with tax obligations and to prevent their violation must be guaranteed to the competent company functions. It is forbidden to engage in conduct that violates tax law provisions and that is aimed at tax evasion or obtaining non-existent, fictitious, or otherwise undue credits/tax withholdings; in particular, it is expressly forbidden to engage in (i) deductions of fictitious or non-existent passive elements, (ii) objectively or subjectively simulated conduct, (iii) fraudulent conduct capable of hindering the assessment activity or misleading the Tax Administration, (iv) producing false, fictitious, or otherwise artificial documents. It is forbidden to engage in any conduct aimed at allowing the use of undue, non-existent, or fictitious tax credits; declarations, projects, reports, and any other documentation used and aimed at obtaining benefits must contain only truthful information and in any case must comply with the regulatory provisions. In particular, it is forbidden to produce false or altered documents and/or data or to omit due information. Those who perform a control and supervision function on the fulfillment of obligations related to obtaining tax credits/refunds (payment of invoices, assignment of projects and/or assignments, etc.) must pay particular attention to the implementation of such obligations by the persons in charge. It is also forbidden to engage in conduct that could constitute an abuse of tax law by carrying out operations that lack economic substance which, although formally complying with tax regulations, essentially achieve undue tax advantages. It is forbidden to issue or use invoices for non-existent transactions. The prohibition concerns (i) both objective and subjective non-existence (the case where the provider of the service is not the real one), (ii) both total and partial non-existence or the so-called over-invoicing. It is forbidden to engage in any conduct aimed at concealing or destroying, in whole or in part, accounting documents that must be kept for both tax and civil purposes. It is forbidden to simulate the sale or carry out fraudulent acts on the company's assets, in order to render the coercive collection procedure wholly or partially ineffective (it is not excluded that this challenge can also occur during the tax assessment phase), in order to avoid the payment of income tax or VAT or the related interest or penalties if the total amount exceeds fifty thousand euros.

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### **III.3. ANTI-CORRUPTION**

#### **Relationships with Public Administrations and Other Third Parties**

An anti-corruption policy must be adopted and respected in line with the provisions of this Code and, in any case, with the applicable regulations. In particular, Recipients who represent the company, or act in the interest of the company, or have business relationships with it must refrain from any form of corruption with respect to both public and private parties. Relations with Public Administrations and Institutions, national, Community, or international, must be based on the strictest respect for the applicable legal provisions, and must also conform to the principles of honesty, fairness, and transparency. Within the framework of relations with national, Community, or international Public Administrations and Institutions, it is necessary to comply with the applicable legal provisions and, in any case, be guided by principles of honesty, fairness, and transparency. Within the framework of relations with national, Community, and international Public Administrations or Institutions, as well as with public officials or persons entrusted with a public service, or bodies, representatives, mandataries, exponents, members, employees, consultants, persons entrusted with public functions, it is not permissible to improperly influence the decisions of the Administrations or Institutions themselves and in particular of the officials who deal with or decide on their behalf. During a negotiation or business relationship, even a commercial one, with Public Administrations or Institutions, it is mandatory to refrain from the following behaviors:

- Offering or granting job opportunities and/or commercial advantages to public officials involved in the negotiation or relationship, or to their relatives
- Offering gifts and other benefits, unless they are acts of commercial courtesy of modest value
- Providing false information or failing to communicate relevant facts, where requested.

In any case, it is not permitted to pay, or offer, directly or through third parties, sums of money or other benefits of any kind or amount to public officials, whether they are public officials, government representatives, public employees, or persons entrusted with a public service to compensate or repay them for an act of their office, nor to obtain the execution of an act contrary to the duties of their office. All this even in the case of coercion by the public official who abuses his or her quality or powers. It is forbidden to pay or promise money or other benefits (e.g. fictitious consultancies or with higher compensation that does not find adequate justification in relation to the type of assignment, etc.) to subjects who exploit or boast of relationships (alleged or existing) with public officials or persons entrusted with a public service:

- as the price of the illegal mediation by the mediator on the public official or the person entrusted with a public service for the benefit of the company,
- as remuneration intended for a public official or a person entrusted with a public service for the exercise of the functions or powers of the latter (or for the performance of an act contrary to the duties of office, an aggravated hypothesis) It is also expressly forbidden to



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be given or promised money or other benefits, exploiting or boasting of existing relationships with a Public Official or a Person Entrusted with a Public Service:

- as the price of one's own illegal mediation (offer) on the public official/person entrusted with a public service;
- as remuneration to be given to the Public Official or Person Entrusted with a Public Service for the exercise of their functions or powers (or for the performance of an act contrary to the duties of office: aggravated hypothesis)

Even with respect to private individuals, it is necessary to avoid offering and granting directly or indirectly money, job opportunities, gifts, or other benefits, in order to induce them to commit or omit acts in violation of their duties of office or loyalty (e.g. for Italy pursuant to articles 2635 and 2635 bis of the Civil Code), in order to obtain an undue advantage for the individual company. SVAD DONDI does not in fact admit any form of payment or grant of advantages to customers, commercial counterparties, and third parties in general, which is not strictly derived from a contractual obligation or a business relationship governed by a contract. SVAD DONDI also expects its customers, suppliers, and other parties to share this principle and act in accordance with it. The Supplier must base its relations with SVAD DONDI on the needs of its customer, on loyalty, professionalism, availability, and timeliness in responding to commercial requests, and on the punctual fulfillment of the obligations assumed, encouraging continuous collaborations and solid and lasting relationships of trust. The same principles must be applied by the Supplier to its suppliers and subcontractors and to the entire value chain. In the selection of Suppliers and in the assignment of professional assignments, objective and transparent selection mechanisms must therefore be respected, inspired by principles of competence, efficiency, transparency, and fairness, and the phases relating to the establishment, management, and termination of the aforementioned relationships must be adequately documented. It is necessary to contribute to the well-being and growth of the entire community in which it operates. To this end, the company and the Supplier must comply, in carrying out their activities, with respect for local and national communities, promoting dialogue with them, with the public institutions that represent them, and with trade unions or other associations. No relationship must be established with organizations, associations, or national or international movements that pursue, directly or indirectly, illegal or, in any case, unlawful purposes.

### **Relationships with Public Inspection Bodies and Judicial Authorities**

It is necessary to give full and scrupulous implementation to the obligations towards the Supervisory Authorities and to actively collaborate during inspection activities. It is forbidden to exercise directly or indirectly undue pressure (in any form exercised or attempted) aimed at inducing the judicial authority to favor the Company in the decision of the dispute. In the event of an investigation by a judicial authority (or delegated judicial police), maximum collaboration and

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transparency must be provided, without reticence, omissions, or declarations that do not correspond to the truth. Anyone who asks their subordinates not to provide the requested information or to provide information that is not true will be sanctioned. In relations with the judicial authority, those who are investigated or accused in a criminal proceeding, even connected with or related to the work activity performed in the Company, are required to freely express their representations of the facts or to freely evaluate the exercise of the right not to answer granted by law. It is expressly forbidden for anyone to coerce or induce, in any form and by any means, in the misguided interest of the Company, the will to respond to the judicial authority or to avail oneself of the right not to answer.

### **Relationships with Customers**

SVAD DONDI bases its business activity and the conduct of its business on quality, understood not only as a product quality but also as attention to the particular needs of Customers, on professionalism, availability, and timeliness in responding to commercial requests, and on the timely examination of complaints, for the full satisfaction of its Customers. In relations with Customers, correct and clear attitudes must be adopted, privileging, whenever possible, the written form, in order to avoid misunderstandings or misunderstandings about the content of the commercial relationships in place. It should be noted that the prohibition of offering and granting directly or indirectly money, job opportunities, gifts, or other benefits - specified in point III.3 "ANTI-CORRUPTION" - "Relationships with Public Administrations and other third parties", to commit or omit acts in violation of the duties of office or loyalty, in order to obtain an undue advantage for the individual company, also applies to relationships with Customers (e.g. for Italy understood as the subjects indicated in articles 2635 and 2635 bis of the Civil Code). It is therefore expressly forbidden to: offer, deliver or promise, even through a third party, to anyone, for himself or for others, undue money so that the recipients commit or omit acts in violation of the obligations inherent in their office or their duties of loyalty towards the entity for which they work; grant or promise anyone other undue benefits, including but not limited to, forms of entertainment, gifts, trips, and other valuables, for the purpose mentioned above; solicit or receive undue money or accept the promise thereof, for oneself or for others, even through a third party, to perform or omit acts in violation of the obligations inherent in one's office or one's duties of loyalty; solicit or receive other undue benefits or accept the promise thereof for the purpose mentioned above; force anyone to perform or omit an act through violence or threat, in order to obtain an unjust profit for the Company to the detriment of others; appropriate money or movable property of others of which one has possession in order to obtain an unjust profit for the Company.

The Company considers corrupt acts to be both illegal payments made directly by state subjects and/or institutions or by their personnel, and those made through subjects acting on behalf of the same in Italy or abroad. The Company is aware of belonging to a value chain in which there may be harmful impacts on the protection of human rights, climate, and the environment, and intends to work to guarantee its customers, engaged in sustainability paths, its full adherence to the

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behavioral principles defined by them. To this end, it undertakes to structure a process aimed at the periodic verification of the contents of the Codes of Ethics disseminated by customers and gradually updated by them, as well as the integration of any additional behaviors in its own Code of Ethics and Conduct or in any case the alignment of its Code with such Codes, which is disseminated internally and to sub-suppliers.

### **III.4. CONDUCT AGAINST COMMERCIAL FRAUD**

It is necessary, within the scope of one's business activities, to avoid any possible form of disturbance to the freedom of industry or commerce, as well as any possible conduct of unfair competition, fraud, counterfeiting, or usurpation of industrial property titles. Therefore, fraudulent conduct, expressions of dishonest and unfair commercial practices, are prohibited as they lack the correctness and honesty that must always characterize commercial transactions. The following are therefore condemned and prohibited:

- The intentional communication to the customer (even a potential one) of false or incomplete information concerning the products or services sold;
- The delivery to the customer of products that are different in origin, provenance, quality, or quantity from those declared or agreed upon (e.g., the manufacture of products using toxic substances or, in any case, prohibited by specific regulations or by law, discrepancies also regarding non-essential qualifications of the product in relation to its usability, value, or degree of conservation, etc.);
- The placing on the market or in circulation of industrial products, with names, trademarks, or distinctive signs, national or foreign, that are likely to mislead the purchaser as to the origin, provenance, or quality of the work or product.

### **III.5. PROTECTION OF COMPETITION AND CONFLICT OF INTEREST**

It is necessary to contribute to the development of a sound and fair competitive system, in compliance with the laws that govern the matter. Furthermore, it is necessary to refrain from engaging in and/or encouraging behaviors that could constitute forms of unfair competition, such as customer diversion, customer poaching, even through violation of the principles of subparagraph III.3. In conducting one's business, it is necessary to avoid situations where the parties involved in the transactions are, or may even appear to be, in a conflict of interest. A conflict of interest shall be deemed to exist where the party involved has an interest other than the purpose pursued by the transaction or carries out activities that may in any way interfere with its ability to make decisions in the exclusive interest of the company for which it works, or personally benefits from business opportunities that the Supplier derives from the relationships with SVAD DONDI. It

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is necessary to refrain from carrying out activities that are contrary to the interests of the Company, being aware that the pursuit of such interest cannot, however, legitimize conduct contrary to the Principles of the same. In the event of a conflict of interest, the Supplier must promptly inform SVAD DONDI and comply with the decisions taken by the latter in this regard.

### **III.8. CORRECTNESS AND TRANSPARENCY OF COMPANY INFORMATION**

Every action, operation, or transaction must be correctly recorded in the company's accounting system according to the criteria indicated by the law and the applicable accounting principles; it must also be duly authorized, verifiable, legitimate, consistent, and congruent.

The accounting records - all the documentation that represents numerical management facts, including internal expense reimbursement notes - must be kept in an accurate, complete, and timely manner, in compliance with the company's accounting procedures, in order to provide a faithful representation of the financial position and management activities. Internal information and training on tax matters must be promoted and the widest possible dissemination and knowledge of the policies/procedures adopted by the Company in the preparation of tax returns and the liquidation and calculation of taxes must be guaranteed to the competent company functions.

To ensure that the accounting reflects the truthfulness, completeness, and transparency of the recorded data, adequate and complete supporting documentation must be kept for each transaction. This documentation should allow for:

- Accurate accounting recording
- Immediate identification of the characteristics and motivations behind the transaction
- Easy formal and chronological reconstruction of the transaction
- Verification of the decision-making, authorization, and implementation process, as well as identification of the various levels of responsibility

Each employee is responsible for ensuring that any fact relating to the company's management is correctly and promptly recorded in the accounting. Each accounting entry must accurately reflect the supporting documentation. Employees responsible for documentation must ensure that it is easily retrievable and logically organized.

Financial statements and social communications as required by law and applicable regulations must be clear and present a true and fair view of the company's financial position.

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### **III.9. USE OF INFORMATION SYSTEMS, PERSONAL DATA PROTECTION, AND COPYRIGHT PROTECTION**

Each Top Executive and Employee is responsible for the security of the IT systems used and is subject to the applicable regulations, the terms of the license agreements, and the internal company procedures. The Company uses the assigned IT resources exclusively for the performance of its own activities, in full compliance with the regulations on the use and management of IT systems and the defined company procedures. Furthermore, it is not permitted to install unlicensed software on computers or devices owned and/or used by the Company, or to use and/or copy documents and material protected by copyright (audiovisual, electronic, paper, or photographic recordings or reproductions) without the express authorization of the rightful holder, except in cases where such activities fall within the normal performance of the assigned duties. It is also expressly forbidden to download illegal content or transmit to third parties content protected by copyright law. Without prejudice to the provisions of civil and criminal laws, the improper use of company assets and resources generally includes the use thereof for purposes other than those related to the employment relationship or to send offensive messages or messages that may damage the Company's image. It is mandatory to make the necessary effort to prevent the possible commission of crimes through the use of IT tools. In particular, in order to exclude unlawful conduct contrary to the current regulations on IT matters, employees and other parties operating on behalf of the Company, even through third-party systems, are prohibited from:

- Illegally accessing a computer or telematic system protected by security measures, or remaining therein against the express or tacit will of those who have the right to exclude it;
- Illegally holding and disseminating access codes to computer or telematic systems protected by security measures, by procuring, reproducing, disseminating, or delivering codes, keywords, or other means suitable for access or providing others with instructions suitable for the aforementioned purpose;
- Disseminating equipment, devices, or programs designed to damage a computer or telematic system or to totally or partially interrupt its operation;
- Fraudulently intercepting information relating to a computer or telematic system (or occurring between multiple systems), or illegally preventing or interrupting such communications, or installing equipment designed to intercept them;
- Damaging information, data, or other people's computer programs, including those used by the State or other public body or of public utility, through the introduction or transmission of data, information, or programs;
- Committing computer fraud in violation of the legal obligations for the issuance of a qualified electronic signature certificate.

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It is mandatory to comply with the procedures and instructions provided by the Company regarding the privacy of data subjects, including but not limited to those that are the subject of written commitments undertaken by the Company in favor of third parties in the capacity of external data processors. It is also mandatory to refrain from unfair competition practices towards third parties. Personnel are required to scrupulously respect any non-competition agreements entered into with third-party former employers and having an effect beyond the termination of the relationship with them, promptly notifying the Company in writing of any possible risk of violation thereof.

### **III.10. RELATIONSHIPS WITH SUPPLIERS**

SVAD DONDI manages relationships with Suppliers with loyalty, fairness, and professionalism, encouraging continuous collaboration and solid and lasting relationships of trust. The selection of Suppliers and the determination of purchasing conditions are based on objective and impartial evaluations, based on quality, environmental awareness, price, and guarantees provided also regarding compliance with the provisions of this Code and the Code of Conduct developed by the Company and delivered to its Suppliers. In relations with Suppliers, the following principles must be adhered to:

- Purchasing is the responsibility of dedicated offices;
- Forms of "reciprocity" with Suppliers are not permitted: the goods/services that the Company purchases are selected and purchased exclusively on the basis of their value in terms of price and quality;
- Any negotiation with a Supplier, current or potential, must exclusively concern the goods and services subject to negotiation with the Supplier;
- Personnel in charge of purchasing goods and services must not be subjected to any form of pressure, on the part of Suppliers, for the donation of materials, products, and/or sums of money in favor of charities or similar associations.

In relations with Suppliers, it is necessary to adopt transparent and clear attitudes, privileging, whenever possible, the written form, in order to avoid misunderstandings or misunderstandings about the content of the commercial relationships in place. The assumption of commitments and the management of relationships with Suppliers, current and potential, must take place in compliance with the provisions contained in this Code. It should be noted that the prohibition of offering or granting directly or indirectly money, job opportunities, gifts, or other benefits, specified in point III.3 "ANTI-CORRUPTION" - "Relationships with Public Administrations and other third parties" and "Relationships with Customers", in order to induce the commission or omission of acts in violation of the duties of office or loyalty, for the purpose of obtaining an undue advantage for the individual company, also applies to relationships with Suppliers (e.g. for Italy understood as the subjects indicated in articles 2635 and 2635 bis of the Civil Code).



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### **III.11. RELATIONS WITH POLITICAL, TRADE UNION, AND SOCIAL ORGANIZATIONS**

SVAD DONDI contributes to the well-being and growth of the community in which it operates. To this end, it conforms, in carrying out its activities, with respect for local and national communities, promoting dialogue with local communities, the public institutions that represent them, and trade unions or other associations. However, it is possible to contribute to the aforementioned organizations where all of the following conditions exist simultaneously:

- Legality of the cooperation;
- Purpose attributable to the Company's mission;
- Clear and documentable destination of resources;
- Express authorization, by the responsible functions, to manage such relationships within the Company.

It is necessary to base one's relationships with representatives of political institutions on the strictest respect for current legislation and company guidelines and on maximum transparency, integrity, and impartiality, also refraining from exerting any direct or indirect pressure. The Company does not promote or engage in any kind of relationship with organizations, associations, or national or international movements that pursue, directly or indirectly, criminal purposes or, in any case, purposes prohibited by law.

### **III.12. MONITORING ACTIVITIES, VIOLATIONS, AND SANCTIONS**

All Reporters, in the event that they become aware of alleged violations of this Code, Section II, must immediately inform the Legal Representative in the following ways:

- direct reporting;

Reporters must:

- offer maximum cooperation in ascertaining possible and/or alleged violations of this Code, Section II;
- inform their sub-suppliers or other similar third parties (e.g., business partners, customers, consultants) with whom they have business relations, about the provisions of the Code, Section II, submitting the clause specifically prepared by the Company.

Compliance with this Code, Section II, must be considered an essential part of the contractual obligations of the employment relationship (or other nature) between Employees or Company Executives and the Company (e.g., for Italy, pursuant to and for the purposes of Article 2104 of the Civil Code) according to the applicable regulations. Consequently, any violation of the

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provisions of the Code, Section II, may constitute a breach of the obligations of the employment relationship and/or a disciplinary offense, with all legal consequences with regard to the imposition of disciplinary sanctions, up to and including termination of the relationship with consequent compensation for damages in accordance with the applicable regulations (in particular for Italy, as provided for by Article 7 of the Statute of Workers and the applicable collective bargaining agreement). Compliance with the principles of this Code, Section II, is part of the contractual obligations assumed by the Top Executives, consequently any violation of the provisions contained therein by the Top Executives constitutes a breach of the contractual obligations assumed, with all legal consequences with regard to the termination of the contractual relationship and the compensation for damages arising therefrom, according to the applicable local regulations. It is also understood that violations committed by Top Executives of the Company will entail the adoption, by the competent corporate body, of the sanctioning measures deemed most appropriate in relation to the nature and seriousness of the violation committed and the qualification of the person who committed the violation, in accordance with the applicable local regulations.

### **Third Parties**

Compliance with the provisions of this Code is an essential part of the obligations of third parties (suppliers, business partners, customers, collaborators, consultants, etc.) who have business relations with SVAD DONDI, both in the case where this Code is expressly accepted and where it has been expressly referred to in contractual agreements or in the general terms and conditions of contract or in further contractual documentation accepted by third parties in writing or in any other form provided for by applicable law. Consequently, any violation of the provisions of this Code within the framework of the activities performed by third parties in favor of the company may constitute a breach of contract with all legal consequences. The aforementioned third parties are also required to verify that their suppliers and subcontractors comply with the provisions agreed upon therein and undertake to indemnify and hold the company harmless from any damages and/or claims by third parties arising from and/or connected to the failure to comply with the provisions provided for therein, even by their own suppliers or subcontractors. In order to allow the verification of compliance with the obligations contained in this Code, third parties undertake to allow any representative of SVAD DONDI and/or any inspector and/or auditor appointed free access, even during working hours, to premises, plants, offices, equipment, documents, accounting books, and minutes, without prejudice to the commitment of SVAD DONDI to keep confidential any information acquired during the inspection. Access must also be granted to subsidiaries and subcontractors of the Company, without the need for any prior notification, without prejudice to the commitment of third parties to offer any assistance that may be necessary during the aforementioned inspections and to keep all relevant documentation and/or functional for the purposes of the aforementioned inspections.