

Code of Ethics Reschiglian Srl

1. AIM

The present document establishes the duties of loyalty, correctness, and diligence which must be observed by all the persons who have working relationships, of any kind, with Reschiglian Srl, and must inspire the conduct and behaviour of all those people who operate- administrative bodies, employees, and collaborators- and/or get into contact with our company, both from the inside and outside of the corporate organization. Therefore, the present Code of Ethics involves clients, employees, collaborators, and all those who have interactions with the company, who firmly believes in pursuing ethically correct principles with loyalty, correctness, and diligence.

2. CODE OF CONDUCT

Everyone has to operate with loyalty, diligence and correctness, taking the responsibilities of their behaviour, also in respect of the current regulation and refraining from behaviours in contrast with the present code. It is the task of the persons in charge to make understand, also with their behaviour, the importance of the respect of what is indicated in the present code, verifying its compliance and encouraging the systematic reporting of violations. Every person is personally responsible for behaviours that can cause any inconvenience that can damage Reschiglian Srl or third parties, and is aware that this can immediately generate every possible legal and employment contract action, aimed at refunding the impairment. Each person in charge, employee or collaborator has to respect the laws and regulations in the name and on behalf of Reschiglian Srl. Every person in charge, employee, or collaborator has to

- avoid the use of company information, goods and/or business equipment available for the ordinary course of work for their personal purposes.
- abstain from any activity which could jeopardize the image, financial strength, or moral integrity of the company.

3. WORK ENVIRONMENT, DIVERSITY, AND INCLUSION

Reschiglian Srl follow the principle of legality, carrying out its activity in compliance with rules and regulations. The principle of legality binds all of the subjects, those who work inside the company as supervisors or subordinates, and also people who interact with Reschiglian Srl from the outside as clients or suppliers, public administration, banking institutions or other authorities. Reschiglian Srl rejects any kind of discrimination based on sex, religion, race, politics, place of origin, status, or anything which can harm people's dignity and morality and/or stop the respect for the individual. Any client, supplier, consultant, employee or collaborator who explicitly declares that they do not share such principle, or other requirements in this code, will not be able to start any relationship with our company. Reschiglian Srl undertakes to guarantee the utmost respect of the human being, giving all its collaborators the right personal and professional consideration, the correct salary within the established regulatory and legislative terms, the right payment of contributions and taxes, as well as the privacy in case of reports of violations of the law or of situations in conflict with the present code. No form of harassment or unwanted behaviour or of social, genre, religious or racial discrimination, or anything which could harm the person's dignity, inside and outside the work environment, shall be accepted. Supervisors must treat their subordinates adequately to their skills and with no form of discrimination. They must also commit to communicating and dialogue with them clearly and effectively. Each person in charge, employee, or collaborator must refrain from: -working under the influence of alcohol or drugs; - cursing or talking rudely; - having intimidatory behaviour towards colleagues; - being offensive towards colleagues and clients, or third parties, or with attitude aimed at discrediting their colleagues' work or professionalism; - having attitudes which may cause damage to the health or safety of the others. Reschiglian Srl undertakes not to use child labour under any circumstances, in compliance with

what is declared in the Conventions of the International Labour Organization (O.I.L.). The company must use only suppliers who ensure respect for the individual, who do not use child labour in compliance with the conventions of the International Organization (OIL), and who demonstrate to be working by the principles of this code; in particular, suppliers must guarantee the correct salary, within the established terms, the right payment of taxes, as well as the privacy in case of reports of violations of the law or of situations in conflict with the present code.

4. ANTI-CORRUPTION

Fighting corruption, refusing it in any context and form is a strong and concrete commitment for Reschiglian Srl. A) **RELATIONSHIPS WITH THIRD PARTIES ACCOUNTS PAYABLE** It is not allowed to give or promise money or other forms of benefits to clients in order to sell at a very convenient condition (i.e. quantity and/or selling price). Likewise, it is forbidden to ask for or accept money or other utilities to adopt conditions that are not justified by the contractual relationship, so as to advantage clients. It is as well forbidden to ease irregularities or fraud. The application of the price list, as well as of discounts, promotions and gifts for clients, must follow the company procedures with particular reference to their approval and the related documentation.

ACCOUNTS RECEIVABLE – It is not allowed to give or promise money or other forms of benefits to a client or a representative of a counterpart with whom the company has an interest in concluding a supply of goods or services, to obtain an undue advantage (i.e. an unjustified discount). Likewise, any request or acceptance of money or other forms of benefits from an employee or representative of a counterpart to obtain an undue advantage in concluding a supply is prohibited. The choice of suppliers and external collaborators (including consultants, agents, etc) for the purchase of goods and services must be based on evaluations that allow relying on proven quality, integrity, reliability, and cost-effectiveness. In particular:

- the selection process must be clear and, within the limits established by the company procedures, must provide for a competitive negotiation among multiple counterparts;
- the choices must be traced and the documents that prove the respect of the internal procedures and the purposes of the purchase must be adequately filed;
- the stipulation or continuation of any relationship must be interrupted in case of acts or suspected behaviour of corruptive nature. The purchase operations of goods and services must be carried out by authorized subjects by virtue of the spending power established by the power of attorney and by the specific amount limits set therein. For every purchase operation it is necessary to verify and trace with adequate documentation:
- that the good/service rendered by the supplier and/or consultant corresponds to what was requested and/or arranged;
- that the price paid to the supplier/consultant is in line with the market prices and/or anyway justifiable because of the given service and of the specific expertise required. It is forbidden to make payments in favour of suppliers/consultants that are not adequately justified in the context of the contractual relationship established with them. Regarding the receipt of gifts and hospitality from third parties, in the context of courtesy relationships, please refer to the principles in paragraph C) “Gifts and entertainment expenses”.

B) **RELATIONSHIPS WITH PUBLIC AUTHORITIES**- The relationships of the Company with the persons who represent the Public Administration, the Public Officers or the persons in charge of public services must be based on principles of correctness, loyalty, and the utmost transparency, as well as on compliance with the applicable provisions and regulations. In the context of the relationships with the Public Administration, Public Officers or the persons in charge of public services, it is not allowed to seek or establish relationships of favour, influence, or interference, to influence, directly or indirectly, their activities. It is forbidden to promise or offer representatives of the Public Administration money, goods, and grant economic advantages or benefits of any kind, except within the limits of modest value in the context of courtesy relationships, not to violate the integrity and good reputation of the Company.

The relationships in question must be managed only by persons in charge and authorized for the purpose, within the limits of the powers conferred to them with a formal power of attorney or in the

context and limits of their roles and responsibilities. The traceability of all the relationships with the Public Administration, the Public Officers or the persons in charge of the public service must be ensured by the drafting of minutes/reports/explanatory notes and by their correct archiving and conservation. The minutes/reports/explanatory notes must contain information suitable for a complete and thorough representation of the event, such as:

- date and place of the meeting/contact;
- object and reason for the meeting; names and roles of all the participants of the meeting;
- expressed positions on the discussed topic and conclusions.

C) GIFTS AND ENTERTAINMENT EXPENSES – Gifts and hospitality are allowed for promotional and commercial reasons or of courtesy relationships; on the other hand, they are considered as a corruptive practice if given to obtain other types of advantages which are not due to exercise an improper influence. Gifts and hospitality can never be allowed, therefore neither accepted nor offered, regardless of their value, if:

- they are in cash;
- they violate laws or regulations;
- they are given or received to obtain an improper advantage or a preferential treatment or motivated by the desire to influence the autonomy of judgment.

Gifts or hospitality are allowed in respect of the company procedures, with particular reference to their authorization, identification of the recipient counterpart and the related documentation. The entertainment expenses of the employee must be summarized in an expense report, with a reimbursement, approved by the head of the position and reimbursed after a validity check. It is allowed to receive gifts and hospitality, in the context of courtesy relationships, only if of modest value and in compliance with the company procedures, with particular reference to the methods of acceptance and limits of the allowed amount limits. It is mandatory to refuse money or gifts (except for gifts for commercial use and of modest value, and under € 30.00) as well as favours and/or privileges on a personal basis or to favour third parties towards Reschiglian Srl. The term “gifts” refers to both company products and other goods. The term “hospitality” refers to meals, recreational activities (tickets or invitations to sport or cultural events), travels and overnights stays in hotels and other forms of benefits.

D) SPONSORSHIPS AND DONATIONS – sponsorships and donations, in cash or through gifts for charitable purposes made for ONLUS, non-profit associations and non-profit organizations, can be made in compliance with the company procedures. In particular, they must be duly authorised, with unique identification of the recipient counterparts and of the reasons underlying the disbursement. The contribution, if disbursed in cash, must be made through banks/ authorized financial intermediaries to guarantee its traceability. It is forbidden to offer or pay sponsorships and donations in case they can be interpreted as aimed at influencing the autonomy of judgement or at obtaining preferential treatment or improper advantages.

E) HUMAN RESOURCES – the management process of human resources must be carried out according to criteria of impartiality, transparency, autonomy and independence of judgment. In particular:

- 3 • the selection process for hiring the personnel must be formalized and must guarantee the absence of conflict of interest between the person making the selection and the candidate, and in compliance with the principle of segregation between the functions requesting the resource and the person making the selection;
- the personnel appraisal process must be based on objective and transparent criteria and the disbursement of any possible bonuses must be made following the achievement of pre-set objectives.

It is forbidden to hire employees or collaborators upon specific recommendation of third parties, in exchange for favours, compensations or other advantages for oneself and/or for Reschiglian Srl. The personnel travel expenses are reimbursed within the limits and in compliance with the company procedures which define the types of expenses allowed and the reimbursement ceilings. In particular, the travel expenses are summarized in an expense report, with analytical reimbursement, approved by the head of the function and reimbursed after a validity check, in line with the established limits, as well as interference, by the Human Resource Manager or another person in charge. It is forbidden to use funds and reimbursements for travel expenses for different purposes other than those for which such funds are intended.

5. DATA AND INFORMATION PRIVACY- Reschiglian Srl undertakes not to violate wittingly the rights and intellectual property of third parties; therefore, each person in charge, employee or collaborator:

- a) must maintain the utmost privacy regarding technical, technological, and contractual information, clients and suppliers lists, procedures or anything else which constitutes the company’s intrinsic assets and, in case of

disclosure, might cause financial or image damage to Reschiglian Srl. b) must process personal data, particular data, and confidential information of the company or third parties, in compliance with the current rules on the subject of secrecy and privacy, avoiding any improper use. Warning: the transfer of particular data and/or confidential information to third parties (i.e. clients, suppliers, public and private bodies, etc) must always be authorized in advance by Reschiglian Srl, by the privacy representative or by any of its representatives.

6. HEALTH, SAFETY AND ENVIRONMENT – Reschiglian Srl pursues, among other things, to protect the environment as well as health and safety and moral integrity of the parties involved. For this purpose: a) Reschiglian Srl undertakes to make available the human, instrumental and economic resources necessary to pursue the improvement of the workers' safety and health, as an integral part of its activity and as a strategic commitment in relation to the more general purposes of the company. b) Reschiglian Srl undertakes to adopt all the necessary measures to respect the environment, complying with all the subjects in force to avoid pollution and selecting, where possible, suitable products and materials. c) each person in charge, employee or collaborator, must operate in compliance with the current regulation in the context of occupational health and safety and environmental protection. f) everyone is responsible for the material, equipment and working areas made available by the company, as well as for their correct use and maintenance.

7. ACCOUNT MANAGEMENT-MONEY LAUNDERING – all the persons in charge, employees or collaborators involved in account management operations must comply with the current regulations, guaranteeing the truthfulness of the registrations and of the accounting transactions, and informing their supervisors of any possible anomalies. The accounting archives must be appropriately managed, ensuring the easy traceability of all phases, and the related responsible for each operational process. Every operation and transaction must be correctly recorded, authorized, verifiable, legitimate and congruous. Each person in charge, employee or collaborator of Reschiglian Srl must not accept any form of implication that could represent money laundering deriving from any form of illegal activity.

8. SANCTIONS – the observance of this code of ethics must be considered as an essential part of the contractual obligations of the employees under and by the effect of art. 2104 of the Civil Code. The violation of this code by employees may constitute as breach of the primary obligations of the employment relationship or a disciplinary offense, in compliance with the CCNL, with every possible legal consequence (also with regard to the preservation of the employment relationship), and may lead to the compensation for damages undergone by the company. The observance of this code must be considered an essential part of the contractual obligations of the collaborators and/or people having business relations with the company. The violation of the code may constitute a breach of the contractual obligations, with every possible legal consequence (also with regard to the immediate resolution of the contract and/or appointment), and may lead to the compensation for damages undergone by the company.

9. RESPONSIBILITIES AND DISSEMINATION – the contents of this document, reviewed and approved by the Board of Directors of Reschiglian Srl, must be disclosed, distributed and/or communicated to all the partners, managers, persons in charge, employees, collaborators, agents, consultants, suppliers etc. which have, in various forms and/or title, relationships, even if only occasionally, with Reschiglian Srl.