



Conceria Cristina SpA Gruppo Peretti SpA

"CODE OF CONDUCT"

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Introduction to the "Code of Conduct" of Conceria Cristina S.p.A. and Gruppo Peretti S.p.A.

To ensure the knowledge and respect of the ethical values that must guide all the activities of Conceria Cristina S.p.A. and Peretti S.p.A. Group. (indicated below as "COMPANIES OF THE GROUP") and the activities of all partners working with/for THE COMPANIES OF THE GROUP, the management has formalized the "Code of Conduct".

The Code of Conduct establishes policies and procedures to help each individual to maintain the ethical commitment of the companies of the group. It is the main reference for all employees of the companies of the group, employees and suppliers of the companies of the group; the suppliers, in particular, are required to follow and consider as their own the indications of the Code, in order to disseminate, along the supply chain, the principles embraced by the COMPANIES of the Group..

The policies contained in the Code are not specifically related to the individual operational contexts but want to provide general guidelines to follow in each area of the activity.

The Code of Conduct refers to:

- 1) RESPECT FOR THE LAW;**
- 2) HUMAN RIGHTS;**
- 3) RESPONSIBILITY AND RESPECT TO *THIRD PARTIES*;**
- 4) RESPONSIBILITY AND RESPECT FOR THE COMPANY;**
- 5) REPORTS AND WORKING CONDITIONS (HEALTH and SAFETY);**
- 6) ENVIROMENT**
- 7) WISTLEBLOWING**

1) RESPECT FOR THE LAW

All employees comply with the laws and regulations of the country in which they operate. Employees are required to know laws and regulations related to their area of expertise.

1.1 Knowledge of the Law

Department managers ensure that all their employees are aware of the laws and the resulting behaviour and, if in doubt, all employees are properly guided to resolve any concerns.

Department managers who, even occasionally, manage their activities in relation to institutions and public administrations shall ensure:

- guidelines and instructions to employees on the conduct/behaviour to be kept in formal and informal contact with the institutions, in accordance with the activities/responsibilities assigned to employees and transferring them knowledge of the rules and awareness of the risks to non-compliance or related crimes;
- appropriate instructions for tracking the flow of information to the Public Administration.

All consultants, suppliers, customers and anyone else who collaborates with the company are committed to complying with the laws and regulations of the countries in which they operate. No collaboration will start or continue with those parties that do not follow this principle.

1.2 Relationships with Institutions and Public Administration

Working with the institutions (through managers, officials or employees of the Public Administration, also referred to as "public officials") or with other representatives of the institutions, it is forbidden:

- promise or offer them (or their relatives, friends, etc.) money, donations or gifts, except for gifts of modest value (e.g. travel and stays, club/club memberships, are not considered low-value gifts);
- assess or offer job opportunities to civil servants (or their relatives, friends, etc.) and/or offer business or any other type of opportunity that might benefit them;
- promise or offer consultancy assignments;
- to charge representation (sponsorships) for other purposes other than promoting the company's image;
- promise or provide, also through other companies, jobs or other personal services to them, their family members, friends etc.
- facilitating, in the purchasing processes, suppliers or subcontractors indicated by public officials.

These actions and behaviors are prohibited both when carried out by company staff and by other persons acting on behalf of the company.

In relations with the Public Administration and institutions it is also forbidden:

- produce false or altered documents and data;
- concealing documents or omitting to submit authentic documents;
- to behave deceptively or in a way that causes errors in the technical and economic assessments made by the Public Administration /Institutes on the processes/products of the COMPANIES OF THE GROUP;
- omitting informations, requests from the Public Administration, for the purpose of making decisions in favour of the COMPANIES OF THE GROUP.

1.3 Tracking of Acts and Documentation

Managers of the administration and accounting functions ensure that each operation is:

- legitimate, coherent, faithful, authorised and verifiable;
- properly recorded to allow verification of decision-making, authorisation and operational process;
- accompanied by appropriate/authentic documentation in order to allow, at any time, checks on the characteristics and origin of the operation carried out, as well as to allow the identification of the person who authorized, executed, registered and checked it.

1.4 Contrast and complaint of wrongdoing acts

Actions and conduct clearly carried out in violation of the current rules such as to constitute criminal offences, are immediately brought to the attention of the authorities in charge of anyone who finds it, as well as being reported to the direct immediate superior and to the company figure identified as "referent for the application of the Code of Conduct".

Suspected or alleged violation of the law, constituting civil and/or administrative wrongdoing, are immediately brought to the knowledge by employees and collaborators to their direct hierarchical superior, who subsequently, according to the conditions, will inform the "Referent for the application of the Code of Conduct".

In cases where the direct superior, in a hierarchical order, may be directly, or partially/indirectly involved, i.e. the report does not result in any outcome, that is, the employee feels even uncomfortable to address to his direct superior, the information is directly transmitted, in the case of alleged commission of criminal offences, administrative and civil wrongdoing, to the "referent for the application of the Code of Conduct".

The "Referent for the Application of the Code of Conduct" is activated to deepen and possibly follow up the reports received.

1.5 Anti-money laundering

The COMPANIES OF THE GROUP carry on their activities in full compliance with the existing anti-money laundering regulations and the provisions issued by the relevant Italian and foreign authorities, and to this end they commit to refuse to carry out any suspicious transactions in terms of fairness and transparency in all the states in which they operate. Information available to commercial counterparts, suppliers, partners, employees and consultants is therefore checked in advance in order to determine their respectability and the legitimacy of their business before establishing business relationships with them.

2) HUMAN RIGHTS

All employees contribute to the commitment of THE COMPANIES OF THE GROUP to respect human rights. In particular, this commitment is aimed at combating the use of child labour and involuntary; The same commitment relates to respect for free association and the right of workers to represent themselves.

Employees are required to promote these rights within their area of responsibility as well as to require the same level of promotion to colleagues, collaborators or suppliers.

2.1 Free Choice

Compulsory or involuntary work is banned. All work is voluntary and workers are free to cease their cooperation with the COMPANIES OF THE GROUP with appropriate notice.

The practice of requiring workers to be given personal identification documents (passport, work permit, etc.) as a precondition of employment is not used (except for the temporary delivery of documents for case checks and prompt return to the worker).

2.2 Contrast to Child Labor

Child labour is not used at any stage of the production process. The term "minor" refers to persons employed under the age of 15 or under the age of compulsory education or, moreover, less than the minimum age required by national legislation to enter work (it is considered to be the greatest among these ages).

The use of legitimate workplace apprenticeship programmes, in accordance with all laws and regulations, is permitted.

Workers under the age of 18 do not perform dangerous work and are exempt from night work.

(references to the ILO Convention No. 138)

2.3 Women's rights in the workplace

The GROUP COMPANIES tend to develop skills and opportunities for women and to ensure that men and women receive the same salary for carrying out the same tasks.

2.4 Violence and harassment

The GROUP COMPANIES are committed to creating a workplace free from harassment and violence in any form and prohibit behaviors or practices that result in physical, mental, psychological punishment, physical coercion or verbal abuse.

Furthermore, they are aware that special attention must be given to the most vulnerable categories such as women, LGBTQIA+ or migrants, who are more exposed to the risk of violence or harassment.

2.5 Working hours

THE COMPANIES OF THE GROUP are committed to ensure that the total number of working hours is equal to or less than that set by national legislation or collective negotiation provided by the country under consideration.

THE COMPANIES OF THE GROUP are committed to guarantee breaks and rest days that correspond at least to the minimum conditions set by national legislation or collective negotiation provided by the country under consideration.

However, the number of ordinary working hours does not exceed 8 hours per day and 48 hours per week (with the exceptions defined by Article 2 of the ILO Convention No.1).

Overtime work must be voluntary and consensual.

The GROUP COMPANIES will use overtime responsibly, to protect the health and safety of workers, taking into account the following factors: duration, frequency, number of hours worked by the individual worker or by the entire staff.

Overtime is remunerated with an increase.

2.6 Wages and Compensation

Compensation paid to workers complies with laws applicable to the country under consideration, including those relating to minimum pay, overtime and other legally recognized compensation. In accordance with local laws, workers are paid more for overtime.

2.7 Fair and Dignified Treatment

There is no harsh or inhumane treatment, including sexual harassment, corporal punishment, mental or physical coercion, verbal abuse or threats to workers.

2.8 Non-Discrimination

The Group's priority commitment is to support a stimulating work environment, inclusive, respectful of all forms of diversity and participatory, inspired by principles of correctness, freedom and dignity in professional relationships, free of discriminatory behavior - collective and individual.

All employees are required to act with respect to the colleagues, the other employees of the COMPANIES OF THE GROUP and, more generally, all the individuals with whom they are in a professional relationship.

They are required to respect the privacy of others and must refrain from disseminating personal information possibly acquired, randomly, during work.

THE COMPANIES OF THE GROUP prohibit any kind of discrimination or preferential treatment regarding hiring, remuneration, professional training, promotions, dismissals on the basis of age, gender, nationality, marital status, sexual orientation, lifestyle, physical/genetic characteristics, belonging to particular ethnic groups, nation or race, pre-existing health conditions or disabilities, pregnancy status, political opinion, religious

conviction or trade union activity.

The GROUP has issued a "Policy for equal opportunities and the fight against inequalities" and a "Guiding Committee" has been appointed with the task of monitoring and intervening in the event of a report by workers.

2.9 Freedom of Association

Transparent communication and direct engagement between workers and managers are the most effective ways to resolve workplace disputes. THE COMPANIES OF THE GROUP respect the right of workers to freely join, to join (or not to join) trade unions for the purpose of representing, as well as to join in "workers' councils" in accordance with local laws.

Workers are able to communicate openly with the Management regarding working conditions, without having to fear retaliation, intimidation or punitive measures.

2.10 Protection of Individual Rights

With the limits determined by the protection of the rights of others and the limits set out in the following point 4.5, THE COMPANIES OF THE GROUP guarantee the rights and freedoms of opinion, expression and association. THE COMPANIES OF THE GROUP guarantee the protection of personal data (employees, customers, suppliers, etc.) and protect the right to privacy of their employees (privacy) against any interference or injury, from inside or outside the organisation.

3) RESPONSABILITY AND RESPECT FOR THIRD PARTIES

THE COMPANIES OF THE GROUP set up relationships with customers, suppliers, consultants, employees, agents and business partners solely on the basis of criteria of trust, quality, competitiveness, professionalism and compliance with the rules. In the development of initiatives with them, THE COMPANIES OF THE GROUP are committed to:

- establish relationships only with individuals who have a respectable reputation, who are engaged only in lawful activities and whose corporate ethical culture is comparable to the one of THE COMPANIES OF THE GROUP. For this purpose, in the management of relationships with customers, suppliers, consultants, employees, agents and business partners, the information available on the subjects themselves is previously verified;
- transparency of agreements and avoid signing secret agreements or agreements contrary to the law. In particular, with regard to the selection of suppliers, consultants, employees and the purchase of goods or services, THE COMPANIES OF THE GROUP ensure that this activity is based solely on objective parameters of quality, convenience, price, capacity, efficiency that allow a fiduciary relationship with those entities to be set up. THE COMPANIES OF THE GROUP make these choices by structuring relationships based on full respect for the other party and in accordance with the protection of their image, in any case avoiding the exploitation of their position as a relevant partner. THE COMPANIES OF THE GROUP require their suppliers that the materials or products supplied are not subject to prior illegal activities, exploitation of child labour and activities aimed at financing terrorism.

CUSTOMER RELATIONS

Honesty in customer relations is the primary objective in business relations of THE COMPANIES OF THE GROUP.

3.1 Forbidden Behaviors

Any form of corruption is prohibited and condemned by THE COMPANIES OF THE GROUP. Bribes or other means of obtaining undue or improper benefits are not offered and are not accepted.

3.2 Disclosure of Information

Information on the activities covered by the business (e.g. business organization, economic and financial conditions and agreed performance) is made available in accordance with current rules and practices of the relevant industrial sector.

3.3 Intellectual Property

Intellectual property rights are guaranteed; The transfer of technology and knowledge is practiced in a way that protects intellectual property rights.

3.4 Product Compliance with Safety and Quality Requirements

All employees contribute to ensuring that THE COMPANIES OF THE GROUP provide quality products and services and a high level of safety, reliability and environmental protection. In particular, employees are required to fully comply with all standards applicable to the product to prevent, detect and correct especially defects with product safety implications.

3.5 Trueness of Customer Information

All employees provide the Customer with truthful, non-misleading information and data about the characteristics of the products and services sold by THE COMPANIES OF THE GROUP.

4) RESPONSIBILITY AND RESPECT FOR THE COMPANY

All employees contribute to the image of THE COMPANIES OF THE GROUP. As a result, they are obliged to refrain from denigrating THE COMPANIES OF THE GROUP, strategies, its governing bodies and products.

Employees are committed to behaving in a way that always reflects the values made by THE COMPANIES OF THE GROUP, during conversations, seminars or any other situation in which they represent THE COMPANIES OF THE GROUP.

Presentations of THE COMPANIES OF THE GROUP or their activities specially prepared for these events provide truthful information in accordance with the needs of confidentiality and promotion of the company's image.

4.1 Confidential Information

All employees with access to confidential internal information are required to keep this information confidential. Confidential information is that specific information about THE

COMPANIES OF THE GROUP or any other company, which has not been voluntarily made public.

All employees are required to take the necessary measures, in accordance with the rules and procedures in place in The COMPANIES OF THE GROUP to protect the confidentiality of the professional information in their possession (e.g. information on new projects, strategic, industrial, financial or operational data and, more generally, all information whose disclosure could harm the interests of the COMPANIES OF THE GROUP).).

4.2 Conflicts of Interest

All employees are required to avoid conflicts of interest.

A conflict of interest is foreshadowed when an employee, one of his family or friends, is able to benefit personally from an operation carried out in the name or on behalf of THE COMPANIES OF THE GROUP, in particular to customers or suppliers. Specifically, employees are wary of acquiring stakes in supplier or client companies, unless the acquisition consists of the normal purchase of market-listed shares, in accordance with rules prohibiting the use of inside information.

Suppliers are selected on the basis of clear decision-making procedures and objective criteria. Employees are required to put the interests of THE COMPANIES OF THE GROUP before any other assessment, during negotiations with suppliers; this in accordance with the Law and the principles of fairness and fair competition.

4.3 Gifts and Invitations Donation Constraints

All employees are required to respect the principles of integrity and loyalty in their relationships with customers and suppliers. Employees do not solicit gifts directly or indirectly. They refuse any gift with a value that exceeds what is generally accepted by custom or that could compromise the independence of the individual.

This rule also applies to invitations to seminars and conferences or to trips that are not related to your business and business role.

4.4 Use and Protection of Corporate Heritage Assets

All employees are responsible for the appropriate and purposeful use - for business duties only - of any business asset or resource.

Assets of the company's assets are used in accordance with the current company rules/procedures and taking all necessary measures to prevent any damage, theft or unauthorized use by third parties.

Employees are required to protect THE COMPANIES OF THE GROUP from the risk of fraud or misappropriation of goods by carrying out appropriate controls within their area of responsibility.

All employees are wary of using their corporate status or authority to benefit from any kind of favoritism or particular advantage.

With particular reference to computer resources (information systems), it is prohibited to use company assets for non-work reasons, for purposes contrary to legal norms, public order or good manners, as well as to commit or induce the commission of crimes or in any case to racial hatred, the exaltation of violence or the violation of human and constitutional rights.

In addition, it is forbidden to put in place conduct that in any way can damage, alter, deteriorate or destroy computer or telematics systems, programs and computer systems. Each employee is personally responsible for maintaining the security of the assigned information systems, avoiding the fraudulent or misuse of the information systems and the transfer of their login credentials.

The use of information systems is also only functional to the conduct of business activities. It is expressly prohibited from using company information systems for consultation, access and, in general, for any activity involving sites with child pornography content.

4.5 Separation of Professional Activity and Political Activity

All employees involved in political activities such as private citizens during their free time and, outside the workplace, are required to refrain from associating these activities with those carried out in/for THE COMPANIES OF THE GROUP that doesn't fund political parties.

4.6 Adoption of Correct Management Practices

The rules expressed at the point 1.2 relating to prohibited conduct in the context of relations with the Institutions / Public Administration also apply in the relations between THE COMPANIES OF THE GROUP and other private organizations.

In particular, even in the context of non-binding subject to THE COMPANIES OF THE GROUP by contractual relations such as competitors, government agencies and associations, the COMPANIES OF THE GROUP promote first, fair competition following the legal/regulatory provisions on competition and protection of property rights.

5) WORKING RELATION AND CONDITIONS (HEALTH and SAFETY)

THE COMPANIES OF THE GROUP are just one of the fundamental principles of the Philadelphia Declaration of the ILO (1944), which states that work is not a commodity.

With this premise, THE COMPANIES OF THE GROUP promote tools aimed at the general improvement of relationships and working conditions, in all their aspects (e.g. in relation to recruitment, promotions, sanctions, training, relocation, wages, hours, pensions/assistance, negotiation, prevention, protection, health, safety and hygiene at work).

THE COMPANIES OF THE GROUP also recognise "social dialogue" as a privileged means to achieve working conditions that safeguard the competing and reciprocal interests of the organisation and workers.

All employees are required to know and comply with safety rules and regulations and ensure that others also comply with them, in accordance with the Occupational Health and Safety Laws.

Special attention must also be given to the working and well-being conditions of all people still present on the site (visitors, suppliers, customers).

With regard to prevention, all employees are required to:

- lead by example by strictly applying safety rules to themselves and ensuring that others do the same;
- remain vigilant to identify and manage the danger and
- take swift action to ensure that dangerous situations are immediately kept under control.

5.1 WORKPLACE SAFETY

The companies of Gruppo Peretti guarantee a healthy, safe and clean working environment and adopt effective measures to prevent potential accidents and not jeopardize the health and safety of workers in the workplace.

To this end, risk assessments are carried out regularly to identify any potential risks present in the workplace and efforts are made to eliminate or at least reduce and mitigate the causes of such risks.

The exposure of workers to potential safety risks (e.g. electricity, other energy sources, fire, moving vehicles and falls, etc.) is also kept under control through appropriate controls, safety procedures and preventive maintenance.

Workers are given specific personal protection equipment free of charge as required by current laws.

Workers are not sanctioned for behavior aimed at risk prevention and the pursuit of safety. Health and safety training is carried out to ensure that safety practices and equipment are used appropriately and to create a safe working culture.

These trainings are repeated for new staff or those assigned to other tasks.

5.2 Emergency Preparation

Emergency situations and events are identified and assessed. Contingency plans and emergency response procedures (e.g. evacuation procedures) are formalized and known.

5.3 Occupational Accidents and Diseases

Procedures are put in place and a management system is encouraged, to manage, to deal with and to record accidents and illnesses.

5.4 Industrial hygiene

Workers exposed to chemical, physical and biological agents are identified, assessed in their suitability status and subsequently controlled. When the risk cannot be adequately controlled by technical means and operational procedures, appropriate individual protection devices are provided to workers.

5.5 Physically demanding Activity

Workers engaged in physically heavy/wear-and-tear activities, including manual handling of loads, weightlifting, prolonged posture, repetitive or stressful movements, are identified, assessed in their job suit status, and subsequently checked.

5.6 Safety Devices

Physical protections, interlocks and barriers are adopted and properly maintained on the equipment and machinery employed by the workers.

5.7 Workers' Services

Workers are guaranteed decent sanitation, access to drinking water and the ability to have food stored and consumed in infrastructure in adequate sanitary conditions.

The changing rooms provided by the company to the workers, are maintained in adequate cleaning conditions, safety, heat, aeration and adequate space.

5.8 Human Resources Development and Training

The general management of THE COMPANIES OF THE GROUP recognizes in the development of human resources a process of growth and emancipation of the individual, through the expansion of his skills and knowledge. THE COMPANIES OF THE GROUP promote the access to skills development, training and employee growth opportunities on a fair and non-discriminatory basis. In particular crisis situations, these commitments promote the internal mobility or adopt adequate instruments of economic and employment compensation.

6) PROTECTING THE ENVIROMENT

The general management of THE COMPANIES OF THE GROUP and all employees contribute to the policy and environmental commitment of THE COMPANIES OF THE GROUP.

Guidelines regarding traceability, environmental management, management of chemical substances, animal welfare and best practices have been defined in the Group's policies.

6.1 Environmental Permissions and Reporting

All environmental permits (e.g. discharge permits) and their registrations are obtained regularly and kept up-to-date; acts, documents and reports are stored and neatly archived.

6.2 Pollution Prevention and Resource Savings

Waste of any nature, the consumption of water and energy, are reduced or eliminated at the source through practices such as improving production, investments for sustainability, maintenance to plants and processes, replacing materials with others with a lower environmental impact, storing, recycling and reuse of materials.

In detail, the companies of Gruppo Peretti have formalized their commitment and objectives in company policies, specifically in the Environmental Policy.

6.3 Dangerous Substances

Chemicals and other materials that pose a danger if dispersed in the environment are identified and properly managed to ensure safe handling, handling, storage, and final disposal.

6.4 Wastewater and Solid Waste

Wastewater and solid waste generated by the activities, industrial processes and production facilities of THE COMPANIES OF THE GROUP are monitored, checked and treated as prescribed by the reference environmental standards, before their issuance/handling or final disposal.

6.5 Emissions in Atmosphere

Emissions into the atmosphere of volatile organic substances, aerosols, aggressive gases, particulates, or other gases generated by production or maintenance operations are characterized, monitored, controlled and treated as prescribed by the relevant environmental standards, before their final expulsion.

6.6 Protecting the environment, protecting biodiversity and natural habitats

In relation to their activities, THE COMPANIES OF THE GROUP act by prioritising the fight against the loss of natural ecosystems and the protection of valuable anthropized ecosystems (e.g. rural areas). Where this protection is not virtually sustainable, compensations of equivalent value and ecological or social benefits are implemented. Biodiversity, natural ecosystems and natural habitats are considered by THE COMPANIES OF THE GROUP to be a universal heritage.

7)“WHISTELBLOWING”

Contacts

To answer questions about the Code of Conduct, for reporting violations (or alleged violations) of the Code, to follow up any dignified responsibilities incompatible with the hierarchy of responsibilities identified by this Code, for any further information about the Code of Conduct, please contact the “Referent for the application of the Code of Conduct”:

- Stecco.erik@gruppoperetti.com

Mailing address (confidentially):

- Contact person for the Code of Conduct at Conceria Cristina S.p.A. Unipersonale, via Fracanzana 10, 36054 Montebello Vicentino (VI) Italy