

SGUINZI

Code of conduct

Rev. 1 Adopted by the Board of Directors of
Sguinzi Pietro S.p.A.
at the meeting held on 21/05/2025

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1. Introduction

This Code of Conduct establishes the guidelines and standards of integrity and transparency that all employees at every level and in every area of Sguinzi Pietro S.p.A. must adhere to, and supplements the provisions already set forth in current collective and individual employment contracts.

To the extent that these principles are compatible with the nature and terms of each relationship, they shall be extended to the relationships between the Company and its contractors, subcontractors, suppliers, consultants, employees, and interns, in accordance with applicable law.

The mission of Sguinzi Pietro S.p.A. is centered on growth and value creation through the provision of innovative products and services to ensure maximum customer satisfaction, while duly respecting the legitimate interests of all categories of stakeholders (shareholders, customers, employees, collaborators, suppliers, partners, the surrounding community, and the institutions representing it).

Sguinzi Pietro S.p.A. conducts its business in a socially responsible, impartial, and ethical manner, adopting practices of fairness and integrity in managing employment relationships, ensuring worker safety, promoting and encouraging environmental awareness, and fully complying with applicable laws.

These principles are also implemented in accordance with UNI/PdR 125:2022 – “Guidelines on the management system for gender equality”, adopted by the Company as an operational reference to guarantee equal opportunities and an inclusive and discrimination-free working environment.

All business relationships must be based on integrity and loyalty and must be conducted without any conflict between corporate and personal interests. To achieve this objective, Sguinzi Pietro S.p.A. requires that all its directors, managers, and other employees, in the performance of their duties, adhere to the highest standards of business conduct, as set forth in this Code.

Sguinzi Pietro S.p.A. shares the principles of the UN Universal Declaration of Human Rights, the main Conventions of the International Labour Organization (ILO), and the OECD Guidelines. The Code is intended as a guide and support for every director, manager, and other employee of Sguinzi Pietro S.p.A., to help the company pursue its mission as effectively as possible.

The Code is a fundamental element of Sguinzi Pietro S.p.A., which consequently undertakes to:

- ensure that the Code is promptly distributed to all recipients of the Code;
- ensure that all updates and amendments are promptly brought to the attention of all recipients of the Code;
- provide adequate training and informational support, offering appropriate assistance in cases of uncertainty regarding the interpretation of the Code;
- ensure that anyone who reports violations of the Code in good faith is not subject to any form of retaliation;
- adopt disciplinary measures that are fair and proportionate to the type of violation of the Code and apply such sanctions consistently to all directors, managers, and other employees (and, where applicable, third parties) subject to compliance with the Code;

Sguinzi Pietro S.p.A. encourages constructive comments and suggestions from directors, managers, other employees, and third parties regarding the contents of the Code, its application, and related matters. Sguinzi Pietro S.p.A. strives to ensure that these commitments are shared by consultants, suppliers, and any other party that maintains a business relationship with the Company at any time. Sguinzi Pietro S.p.A. does not establish or continue business relationships with parties that refuse to comply with the principles of the Code.

Within the scope of the employment relationship established with the Company, every employee must perform their duties in accordance with the law, internal or external regulations, and the guidelines of this Code, based on a personal and non-delegable commitment to honesty, loyalty to the Company, and transparency in all work activities.

Any conduct

that results in an undue personal benefit for employees or their family members to the detriment of the Company's interests or those of anyone with an interest in the Company (shareholders, customers, suppliers, other employees, the community).

When making a decision related to work activities, for the purposes of applying the aforementioned guidelines, each employee must ask themselves the following questions and seek an answer before acting:

Does this decision comply with internal rules and regulations?

Does this decision adhere to the letter and spirit of the Code of Conduct? Can this decision be considered the most appropriate?

If this decision were made public, could it in any way compromise or damage the company's public image?

2. Application of the Code of Conduct

- *The bodies responsible for enforcing the Code are the internal hierarchical structures with subordinate staff, the Supervisory Board, and the Board of Directors.*

The Board of Directors (BoD), a body composed of the Company's top executives, shall be the highest decision-making body authorized to implement this Code on behalf of the Company.

The Supervisory Body will decide on any matter concerning the interpretation and application of the Code that cannot be satisfactorily resolved by the Company's hierarchical organization.

The Company shall implement appropriate measures to ensure that every employee, supplier, subcontractor, and consultant is aware of the Code and applies it in the workplace. Employees who wish to obtain further information beyond what is provided by their supervisors may send an email to: ODV.SGUINZI@GMAIL.COM.

3. Compliance with the Code of Conduct

- *The guidelines set forth in this Code take precedence over instructions issued by the internal organizational hierarchy.*

Acceptance of the guidelines set forth in this Code is a prerequisite for establishing an employment relationship with the Company.

The application of this Code of Conduct within the Company is a personal and non-delegable responsibility of each employee, who, once informed, may not invoke lack of knowledge of the Code or having received contrary instructions from any hierarchical level as justification for non-compliance.

It is hoped that employees will adopt a proactive attitude, acting on their own initiative, should they detect deviations in company processes from the principles outlined in this Code and therefore not adopt a passive stance in the face of situations contrary to the criteria set forth in this Code.

Supervisors must not approve or tolerate violations of the Code by their subordinates, and

should they discover any violations, they must immediately address them with the person concerned and report them to the appropriate company departments.

Disciplinary sanctions may result, depending on the severity of the violation and in accordance with applicable law, in termination for cause and even legal action.

Compliance with the principles contained in this Code also includes adherence to the criteria of gender equality, inclusiveness and prevention of discrimination, as set forth in UNI/PdR 125:2022.

4. Reporting violations of the Code of Conduct

In accordance with applicable Italian law, the Company has established a communication channel via the email address indicated in Article 2, which will respond to any questions or requests for clarification and receive reports of situations or conduct that violate the principles of the Code of Conduct.

The Company guarantees that appropriate measures will be taken to prevent any form of retaliation against employees who choose to use the Ethics Hotline.

These protections also apply to reports relating to episodes of violence, harassment or discriminatory behaviour, in line with the principles and requirements set out in the management system for gender equality referred to in UNI/PdR 125:2022.

The Company will take all necessary measures to ensure the confidentiality of the information received, the fair treatment of personnel involved in conduct contrary to the Code, and the right of defense of each employee.

5. Guidelines

5.1 Compliance with Laws

Employees must always comply with the laws in force in the individual countries where the Company operates. Personnel must take all necessary precautions to ensure that the Company is not involved, directly or indirectly, in money laundering operations.

5.2 Transparent Management

Employees must follow all necessary procedures to ensure the transparency of information and decisions.

For operational purposes, information is transparent when it accurately reflects reality.

A decision is considered transparent when it meets all of the following requirements:

- a. was made with the approval of the appropriate level of management;*
- b. is based on a rational risk analysis;*
- c. leaves a record of its rationale;*
- d. prioritizes the company's interests over any other interests.*

5.3 Conflicts of Interest and Duty of Loyalty

A conflict of interest, whether actual or potential, exists when a relationship between an

employee and a third party could be detrimental to the Company's interests.

All employees must, in their dealings with customers, suppliers, contractors, and competitors, prioritize the Company's interests over any other situation that could result in a personal benefit, real or potential, for themselves or their family members.

5.4 Gifts and Other Forms of Gratuities

Company employees may accept gifts or other forms of gratuities only if they are of modest value and, in any case, such that they cannot be interpreted by an impartial observer as means to improperly obtain advantages for the recipient.

Employees who receive gifts or preferential treatment not directly attributable to normal courtesy should consult their supervisors to obtain guidance on whether to accept such gifts.

Under no circumstances may gifts in the form of money or goods easily convertible into money be accepted.

Participation by invitation in events, conferences, *conventions*, sales presentations, or technical courses related to work must be authorized by supervisors.

Restrictions on the acceptance of gifts or offers of services also apply to family members of Company personnel.

5.5 Use of Company Assets

Employees must ensure the proper use of company assets, taking care that they are used for legitimate purposes by duly authorized persons.

In accordance with applicable regulations, employees are responsible for protecting the Company's assets and all other property, whether tangible or intangible, from unauthorized use, damage, or loss resulting from incompetence, negligence, or willful misconduct.

5.6 Protection of Company Information

Only persons expressly authorized by the Company or by law may have access to the Company's internal information, whether in paper form or on magnetic, electronic, or optical media, for the purposes and for the periods specified in the relevant authorizations.

Passwords or access codes, which are equivalent to employees' signatures, may be known only to their respective holders and may not be disclosed to third parties.

Employees shall be directly responsible for taking all necessary measures to protect the Company's information from risks of damage or loss and must ensure its safekeeping for the periods of time established by laws and internal regulations.

5.7 Confidentiality of Company Information

Employees must safeguard the confidentiality of information to which they have had access in the course of their work, even if such information is not specifically classified as confidential and does not specifically pertain to the company, but

relates to customers, competitors, suppliers, markets, and public bodies connected with the Company's activities.

Any employee who discloses or facilitates the disclosure of internal information regarding the Company's activities will be in serious breach of the duty of confidentiality.

Information must be kept confidential in accordance with applicable regulations until it becomes public knowledge.

5.8 Prohibition on the Use of Company Information

All directors, managers, and other employees are strictly required to comply with laws regarding the misuse of confidential information. In particular, under no circumstances may directors, managers, other employees, or other recipients of this Code shall use (or disclose to unauthorized third parties) non-public information obtained by virtue of their position within Sguinzi Pietro S.p.A., or by virtue of having a business relationship with Sguinzi Pietro S.p.A., for personal gain or to benefit other third parties.

Confidential information must always be handled by directors, managers, and other employees in strict compliance with the law.

To determine when confidential information should be made public, Sguinzi Pietro S.p.A. follows the procedures established by law.

5.9 Confidentiality Obligation

The know-how and intellectual property developed by Sguinzi Pietro S.p.A. constitute a fundamental resource that every director, manager, employee, and other recipient of this Code must protect. In fact, in the event of improper disclosure of such know-how and intellectual property, Sguinzi Pietro S.p.A. could suffer both financial and reputational damage. Therefore, all directors, managers, other employees, and other recipients of the Code are required not to disclose to third parties information regarding the technical, technological, and commercial knowledge of Sguinzi Pietro S.p.A., as well as other non-public information relating to Sguinzi Pietro S.p.A., except in cases where such disclosure is required by law or other regulatory provisions, or where it is expressly provided for in specific contractual agreements under which the counterparties have undertaken to use such information exclusively for the purposes for which it is provided and to maintain its confidentiality. Any publication of such information shall be made in accordance with the policies of Sguinzi Pietro S.p.A.

The confidentiality obligations set forth in the Code remain in effect even after the termination of the employment relationship.

5.10 Corruption and Illegal Payments

Sguinzi Pietro S.p.A., its directors, managers, other employees, and other recipients of the Code are committed to upholding the highest standards of integrity, honesty, and fairness in all

relationships both within and outside the company, in accordance with national and international anti-corruption laws, with particular reference to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the OECD Guidelines, and the U.S. Foreign Corrupt Practices Act (FCPA).

Sguinzi Pietro S.p.A. does not tolerate any form of corruption (including accepting or offering money to obtain an improper commercial advantage) involving public officials, representatives of international organizations, or other third parties associated with a public official, or involving legal entities, individuals, or other parties as otherwise specified by applicable laws.

No director, manager, other employee, agent, or other representative may directly or indirectly accept, solicit, offer, or pay sums of money or other benefits (including gifts or presents, with the exception of commercial items of modest economic value that are commonly accepted internationally and permitted by law), even as a result of unlawful pressure.

5.11 Use of Technological Resources

Employees may not use technological equipment, systems, and devices for purposes other than those expressly authorized by the Company.

The use of *software* that does not comply with official standards is not permitted, unless authorized in writing by the relevant technical departments.

Employees must refrain from introducing illegal copies of *software*.

Employees who work with technological resources must be informed of usage restrictions and must operate in a manner that does not violate user licenses or engage in acts that would result in liability for the Company.

Technological resources must be used in accordance with applicable laws and regulations and in accordance with the procedural and operational rules established by the Company.

5.12 Employees

Sguinzi Pietro S.p.A. recognizes that the motivation and professionalism of its staff are essential factors in maintaining competitiveness, creating value for stakeholders, and ensuring customer satisfaction.

The following principles, in accordance with national laws, the UN Universal Declaration of Human Rights, and the fundamental conventions of the International Labour Organization (ILO), affirm the importance of respect for the individual, guarantee fair treatment, and exclude any form of discrimination. Sguinzi Pietro S.p.A. supports the protection of fundamental human rights.

•CHILD LABOR AND FORCED LABOR

Sguinzi Pietro S.p.A. does not engage in any form of forced labor or child labor; specifically, it does not employ individuals under the minimum age for employment as established by the laws of the jurisdiction where the work is performed, and in any case, under the age of fifteen, except

as expressly provided for by international conventions and national legislation. Sguinzi Pietro S.p.A. further undertakes not to establish or maintain business relationships with suppliers that employ child labor, as defined above.

● **FREEDOM OF ASSOCIATION**

Employees of Sguinzi Pietro S.p.A. are free to join a trade union in accordance with applicable laws and the rules of the various trade union organizations. Sguinzi Pietro S.p.A. recognizes and respects its employees' right to be represented by trade unions. When Sguinzi Pietro S.p.A. engages in negotiations with such representatives, its actions and conduct are aimed at fostering a constructive approach and relationship.

● **EQUAL OPPORTUNITY**

Sguinzi Pietro S.p.A. is committed to providing equal opportunities in employment and career advancement to all employees. Sguinzi Pietro S.p.A. guarantees that, in all aspects of the employment relationship—including hiring, training, compensation, promotions, transfers, and termination of employment, employees are treated in accordance with their ability to meet job requirements, avoiding any form of discrimination and, in particular, discrimination based on race, gender, sexual orientation, social and personal status, physical condition and health, disability, age, nationality, religion, or personal beliefs.

● **HARASSMENT**

Sguinzi Pietro S.p.A. considers any type of harassment or harassing behavior, such as that related to race, sex, or other personal characteristics, which has the purpose and effect of violating the dignity of the person toward whom such harassment or behavior is directed, whether inside or outside the workplace, to be absolutely unacceptable.

● **WORK ENVIRONMENT**

All employees must strive to maintain a respectful and collaborative work environment in which the dignity of each individual is respected.

In particular, all employees of Sguinzi Pietro S.p.A.:

- o must not perform their duties while under the influence of alcohol or drugs;
- o in places where smoking is not prohibited, they must be sensitive to the needs of those who may experience physical discomfort due to the effects of "secondhand smoke" in the workplace.

● **COMPENSATION AND WORKING HOURS**

The compensation paid to employees of Sguinzi Pietro S.p.A. meets the requirements established by law. With regard to working hours and paid leave, Sguinzi Pietro S.p.A. complies with current legislation.

The Company also guarantees equal pay between genders and the absence of unequal treatment, in accordance with the criteria defined by UNI/PdR 125:2022, regularly monitoring any deviations and adopting corrective measures where necessary.

● **HIRING AND PROMOTIONS**

Employees of Sguinzi Pietro S.p.A. are prohibited from accepting or soliciting promises or payments of money, goods, or benefits, or any form of pressure or favor that may be intended to

promote the hiring of an individual as an employee, their transfer, or their promotion.

Hiring and promotion procedures must be transparent, meritocratic, and inclusive, in compliance with the principles of gender equality and non-discrimination set forth in UNI/PdR 125:2022.

● INTERNAL CONTROL SYSTEM AND ACCOUNTING RECORDS

All managers and other employees of Sguinzi Pietro S.p.A. are required to maintain effective internal control systems. To meet this standard, they are required, among other things, to maintain accurate and complete internal records of all business activities and to ensure that transactions and the assumption of contractual obligations have been properly authorized by the appropriate supervisor.

● COMPANY ASSETS

All directors, managers, and other employees of Sguinzi Pietro S.p.A. must use the company assets and resources to which they have access or which are in their custody efficiently, exclusively for the purpose of achieving the business objectives and goals of Sguinzi Pietro S.p.A., and are also required to use such assets in a manner that protects their value. Furthermore, all directors, managers, and other employees of Sguinzi Pietro S.p.A. are responsible for protecting such assets and resources against loss, theft, and unauthorized use or disposal. Any use of such assets and resources that may conflict with the interests of Sguinzi Pietro S.p.A. or that may be motivated by personal or professional reasons unrelated to the employment relationship with Sguinzi Pietro S.p.A. is prohibited.

● EXTERNAL ACTIVITIES

Managers and other employees of Sguinzi Pietro S.p.A. may not serve on the boards of directors of other companies competing with Sguinzi Pietro S.p.A. without the latter's authorization, and may not engage in business activities on a recurring basis that interfere with their respective obligations to Sguinzi Pietro S.p.A.

● BUSINESS TRAVEL

The corporate guidelines to which this document adheres aim to achieve the full development of communication and relationship flows between departments and individuals through reduced reliance on the physical mobility of resources, alongside the increasing use of technology and the growing maximization of every opportunity related to the full utilization of communication networks.

The technological tools available to the Company—designed to facilitate the sharing and integration of information and knowledge through the use of remote communication methods—as well as promoting the quality and frequency of organizational relationships among company stakeholders—enable a significant contribution to achieving the system's overall efficiency objectives and cost reduction, with particular reference to labor costs and the growing impact that business travel and commuting have on this expense.

With a view to greater operational efficiency, it is therefore of considerable importance to foster a shared awareness that must develop both in terms of the actual necessity of business travel and in terms of individual attention to the cost of each trip.

This shared awareness, translated into operational guidelines, requires managers to direct

their own behavior and that of their staff toward the objectives of containing business travel costs, by more actively promoting alternative communication tools to physical travel for themselves and their staff.

Therefore, the use of business travel must be limited to only those cases that are strictly essential and cannot otherwise be managed using the technological tools available to the Company. In particular, authorizations by managers must be limited to only those cases where the business trip is required by specific work activity and cannot be carried out through alternative means (e.g., video conferences, *collaboration* tools).

The Manager authorizing the business trip shall monitor any *budget* allocated to their department and, in any case, must report—at least quarterly—to the Manager of the higher-level department.

5.13 Intellectual Property Rights

Intellectual property rights arising from inventions developed in the course of work belong to the Company, which retains the right to use such inventions in the manner and at the time it deems most appropriate, in accordance with applicable law.

Ownership of intellectual property extends to projects, systems, processes, methodologies, studies, reports, projections, or any other activity developed by the Company or on behalf of the Company.

5.14 Controls and Monitoring

Sguinzi Pietro S.p.A. is committed to maximizing long-term value for shareholders. To fulfill this commitment, Sguinzi Pietro S.p.A. adopts high standards of financial planning and control, as well as accounting systems that are consistent with and compliant with applicable accounting standards and laws.

in force. In carrying out this procedure, Sguinzi Pietro S.p.A. operates with the utmost transparency in accordance with best business practices, with the aim of:

- o ensure that all transactions are duly authorized, verifiable, and legitimate;
- o ensure that all transactions are executed promptly, accurately recorded and accounted for, and properly documented in accordance with applicable accounting principles and best practices;
- o identify, analyze, and manage with professional diligence the business risks associated with all activities of Sguinzi Pietro S.p.A.;
- o ensure that decisions on financial, tax, and accounting matters are made at an appropriate managerial level and in full compliance with applicable laws;

Sguinzi Pietro S.p.A. considers transparency in the accounting recording of individual transactions to be of fundamental importance to its success. Therefore, employees must maintain truthful and accurate records of all financial transactions and other business dealings,

accompanied by adequate supporting documentation. The improper maintenance of accounting records constitutes a violation of the Code and is considered illegal. All employees are therefore prohibited from engaging in conduct or omissions that could lead to inaccurate or incomplete information.

All managers and other employees required to assist in the preparation and submission of documents intended for regulatory authorities or the public shall ensure, to the best of their ability, that such documents are complete, accurate, reliable, clear, and understandable.

Employees are responsible, in accordance with applicable laws and existing contractual provisions, for maintaining control mechanisms in proper working order to safeguard company assets and support business operations.

It is the primary responsibility of every manager to implement control measures designed to ensure effective monitoring.

Each supervisor is directly responsible for monitoring these measures and for preparing periodic reports on the results obtained during such monitoring.

Systematic supervision and review by managers and directors must ensure that employees are informed of, understand, and implement the control procedures.

When planning and updating the measures necessary to maintain adequate controls, the following criteria must be taken into account, in addition to specific rules and procedures:

- In the absence of procedures or rules, the supervisor's common sense and professionalism shall prevail.
- Each manager exercises authority over any operation under their control and is therefore fully responsible for the results of those operations.
- Every control procedure must include an adequate risk analysis.
- Any control must be analyzed in advance in terms of costs, which must be weighed against the potential benefits.
- Situations in which the control of a transaction or series of transactions is delegated exclusively to a single body must be limited.
- All control procedures must be adequately monitored.
- When defining controls, particular attention must be paid to identifying critical issues that could harm the entire system.

5.15 Sales Incentives

The granting of any commission, discount, credit, or rebate must be in accordance with applicable regulations and officially granted to legally recognized organizations upon presentation of supporting documentation.

In addition to the requirements set forth in the principles above, any commercial incentive must be in line with common commercial practices, not exceed the permitted value limits, and have been approved and recorded in accordance with internal rules.

5.16 Workplace Health and Safety

Sguinzi Pietro S.p.A. recognizes occupational health and safety as a fundamental right of employees and a key element of the company's sustainability. All decisions made by Sguinzi Pietro S.p.A. must respect occupational health and safety. Sguinzi Pietro

S.p.A. has adopted and continues to improve an effective occupational health and safety policy based on preventive measures—both individual and collective—to minimize potential risks of workplace injuries.

Sguinzi Pietro S.p.A. aims to ensure excellent working conditions at the industrial level, in accordance with the principles of hygiene, industrial ergonomics, and individual organizational and operational processes. Sguinzi Pietro

S.p.A. believes in fostering a culture of accident prevention and risk awareness among workers, and actively promotes it,

in particular through appropriate training and information courses. Employees must consider themselves personally responsible and adopt the preventive measures established by Sguinzi Pietro S.p.A. for the protection of their health and safety, as communicated through specific directives, instructions, training, and information. Each employee is responsible for the proper management of safety and must not expose themselves or other workers to hazards that may cause injury or harm to themselves.

● ENVIRONMENTAL PROTECTION IN WORK PROCESSES

Sguinzi Pietro S.p.A. considers environmental protection a key factor to be promoted in its overall approach to business activities.

Sguinzi Pietro S.p.A. is committed to continuously improving the environmental performance of its production processes and to complying with all relevant legislative and regulatory requirements. Sguinzi Pietro S.p.A. encourages employees to actively participate in the implementation of these principles through the dissemination of information and regular training courses, and expects employees to play an active role in applying these principles in their work.

● ENVIRONMENTAL IMPACT AND PRODUCT SAFETY

Sguinzi Pietro S.p.A. is committed to manufacturing and selling products that meet the highest standards of environmental performance and safety, in full compliance with all applicable laws and regulations. Furthermore, Sguinzi Pietro S.p.A. strives to develop and implement innovative technical solutions that minimize environmental impact and ensure the highest levels of safety.

Sguinzi Pietro S.p.A. also encourages the safe and environmentally friendly use of its products.

● WORK ENVIRONMENT

Anyone may apply for employment with the Company or seek career advancement. Hiring and promotion will be determined solely on the basis of business needs and merit-based criteria, without arbitrary discrimination.

These processes must respect the principles of equity, inclusion and non-discrimination based on gender established by UNI/PdR 125:2022, ensuring equal opportunities for access and professional growth for all people, regardless of gender, gender identity or other personal characteristics.

All employees must work together to maintain an atmosphere of mutual respect despite

personal differences.

Respect for diversity and the valorization of individual differences are fundamental pillars of the gender equality management system adopted by the Company pursuant to UNI/PdR 125:2022.

The Company will implement mandatory policies regarding alcohol and drugs, in compliance with the regulatory framework of each country and guidelines aimed at ensuring a healthy and safe work environment.

5.17 External Relations

Sguinzi Pietro S.p.A. and its employees are required to maintain and improve their relationships with all categories of stakeholders by acting in good faith, with loyalty, fairness, transparency, and due respect for the fundamental values of Sguinzi Pietro S.p.A..

●CUSTOMERS

Sguinzi Pietro S.p.A. is committed to fully meeting the expectations of its end customers. All directors, managers, and employees of Sguinzi Pietro S.p.A. are required to act in a manner that exceeds customer expectations and continuously improves the quality of products and services. For Sguinzi Pietro S.p.A., it is essential that its customers be treated fairly and honestly; therefore, it requires its managers, other employees, and all other parties subject to the Code to ensure that every interaction and contact with customers is characterized by honesty, professional integrity, and transparency. In its dealings with customers, Sguinzi Pietro S.p.A. must avoid unfair discrimination in negotiations with them.

●SUPPLIERS

Suppliers play a fundamental role in improving the overall structural competitiveness of Sguinzi Pietro S.p.A.

In order to consistently ensure the highest level of customer satisfaction, Sguinzi Pietro S.p.A. selects suppliers using appropriate and objective methods that take into account not only quality, innovation, costs, and services offered, but also social and environmental performance and the values outlined in the Code. All managers of Sguinzi Pietro S.p.A. and other employees are encouraged to establish and maintain stable, transparent, and cooperative relationships with suppliers.

● PUBLIC INSTITUTIONS

Relationships with public institutions, associations, etc., must be managed solely by the departments and employees delegated to do so. All such relationships must be conducted transparently in accordance with the values of Sguinzi Pietro S.p.A.

Gifts or courtesies (where permitted by law) offered to representatives of public institutions must be of modest value and appropriate, and in any case must not be interpreted as intended to secure or attempt to secure undue advantages for Sguinzi Pietro S.p.A.

Sguinzi Pietro S.p.A. acts in full cooperation with regulatory and governmental bodies within the

scope of their legitimate activities. Should Sguinzi Pietro S.p.A. be subject to legitimate inspections conducted by public authorities, it will cooperate fully.

If a public institution is a customer or supplier of Sguinzi Pietro S.p.A., the latter must act in strict compliance with the laws and regulations governing the purchase from or sale of goods and/or services to that particular public institution.

• **TRADE UNIONS AND POLITICAL PARTIES**

Any relationship between Sguinzi Pietro S.p.A. and trade unions, political parties, and their representatives or candidates must be guided by the highest principles of transparency and fairness and in strict compliance with applicable laws. Contributions in the form of money, goods, services, or other benefits are prohibited.

• **RELATIONS WITH THE MEDIA**

All information regarding Sguinzi Pietro S.p.A. must be provided truthfully and consistently only by managers and employees responsible for media relations, in strict compliance with company policies. All other managers or employees must not provide media representatives with information regarding Sguinzi Pietro S.p.A. that is not in the public domain, nor have any contact with them aimed at disseminating confidential company news; instead, they must ensure that any questions posed by the media are referred to the human resources department.

• **RELATIONS WITH POLITICS ON BEHALF OF THE COMPANY AND RELATIONS WITH GOVERNMENT OFFICIALS.**

Company employees are not authorized, on behalf of the Company, to publicly support political parties, participate in election campaigns, or take part in religious, ethnic, political, or international conflicts.

All Company employees must comply with the laws and regulations governing relations with local government officials.

5.18 Implementation and Safeguards

Sguinzi Pietro S.p.A. is committed to achieving the highest standards of excellence regarding its moral, social, and business responsibilities toward its stakeholders. The Code defines Sguinzi Pietro S.p.A.'s expectations of directors, managers, other employees, and third parties with whom it has business relationships, as well as the responsibilities they are required to assume to implement these policies.

All requests for clarification are promptly addressed without any risk to the employee of suffering any form of retaliation, even indirect.

Any disciplinary measures for violations of the Code, commensurate with the specific violation, are imposed by the Human Resources Department after consulting with the employee's supervisors.

Any form of retaliation against individuals who have reported possible violations of the Code in good faith or requested clarification on how the Code is applied constitutes a violation of the Code. Likewise, the conduct of anyone who accuses other employees of violating the Code while knowing that no such violation exists constitutes a violation of the Code.

Violations of the Code may result, among other consequences including the initiation of legal proceedings, in the termination of any relationship of trust between Sguinzi Pietro S.p.A. and the employee in question, with the contractual and legal consequences regarding the employment relationship provided for by applicable regulations.

Any exceptions to the provisions of the Code—even if only partial and limited in time and scope—may be authorized exclusively for serious and justified reasons by the Board of Directors of Sguinzi Pietro S.p.A.

5.19 Obligations

The Code is an integral and essential part of the employment relationship of every manager and other employee of Sguinzi Pietro S.p.A., which consequently requires all managers and other employees to strictly comply with the provisions of the Code. Any violation of the Code's provisions is therefore dealt with firmly, resulting in the adoption of appropriate disciplinary measures, which in certain cases may lead to termination of employment.

Therefore, all employees and managers are required to:

- o read and understand the Code; and
- o act and behave in accordance with the Code and refrain from any conduct that could harm Sguinzi Pietro S.p.A. or compromise its integrity, impartiality, or reputation;
- o promptly and in good faith report any violations of the Code;
- o Consult the Human Resources department for clarification regarding the interpretation of the Code; cooperate fully with any investigations conducted in connection with violations of the Code, maintaining the strictest confidentiality regarding the existence of such investigations; and actively participate, where requested, in audits of the Code's implementation.