

# Code of Ethics

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## COLOROBRIA

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since 1921



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# Introduction

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This document (hereinafter “Code of Ethics” or “Code”) is intended to collect and bring to the attention of all those who work with Colorobbia Italia S.p.A., the values, principles and rules that guide the conduct and activities of the Company itself.

With this Code, Colorobbia Italia S.p.A. seeks to express its adherence to the values in which the Company believes and in which it recognises itself, for this reason, it has identified as its main points of reference, human resources, its workers, stakeholders, shareholders, customers, suppliers, partners, the State, local authorities, the Public Administration and the community as a whole, setting objectives and commitments to:

- **Define and implement** Company policies that, starting from the top, involve all levels of the organisation in compliance with the principle of equal dignity and treatment at work;
- **Identify** corporate functions to which clear responsibilities are attributed, overcoming gender stereotypes, through appropriate Company policies, training and awareness-raising;
- **Integrate** the principle of equal treatment into the processes governing all stages of professional life and the development of human resources so that decisions on recruitment, training and career advancement are taken solely on the basis of people’s skills, experience and professional potential;
- **Provide** concrete tools to promote the reconciliation of life and work times by favouring the meeting between supply and demand of business and personal flexibility. This can be done through the help of policies and collaboration with the territory and the agreement with integrated public and private services;
- **Promote** the visibility internally and externally of the Company’s commitment, giving testimony of the policies adopted and the progress achieved with a view to a truly supportive and responsible community;
- **Comply with** and share all the regulatory provisions in force in terms of occupational accident prevention and hygiene, both in Italian facilities and abroad;
- **Maintain** organisational models that support and enhance human resources and that also integrate customers, suppliers, partners and institutions in a process of continuous improvement;
- **Communicate** to personnel, in the most appropriate way, the commitment made to a corporate culture, informing them about the projects undertaken in the areas of worker protection and respect for the environment, safety and on the practical results achieved.

Colorobbia Italia S.p.A. also sets itself further objectives and commitments in terms of:

- **Protection of consumers/customers:** protecting their interests in the broadest sense and ensuring that they enjoy fair treatment by properly communicating policies and activities that may influence their choices;
- **Social citizenship:** to contribute concretely to the well-being of the community in which it operates, to the shared solution of existing problems in the territory and to the growth of relationships based on mutual trust;
- **Sustainable development:** protecting the interests of future generations, recognising the close interdependence between business decisions and environmental impacts, going beyond pure and simple compliance with formal standards, committing to the development and adoption of innovative and eco-efficient technologies.

This document therefore establishes the set of duties, including moral ones, and internal and external responsibilities of all persons and bodies operating within and with Colorobbia Italia S.p.A., aimed at affirming the values and behaviours recognised and shared by the Company.

### Purposes and recipients

The Code of Ethics is an essential tool with which Colorobbia Italia S.p.A. intends to give directives and suggestions so that its personnel operates according to a moral behaviour that is concretised in the following intentions:

- Operating with loyalty, fairness and collaboration in relations between colleagues;
- Complying with the laws in force in the national territory;
- Collaborating with the Management to prevent crimes related to corruption and illegal practices;
- Respecting the interests of any subject or body that enters into contact with the Company (customers, consumers, institutions, public authorities and the external community);
- Carrying out their role with seriousness and professionalism, always respecting human dignity. The Code defines the ways in which to carry out the operating procedures with adequacy, also outlines the penalties in case of violation by the personnel.

This document codifies the principles of legitimacy, fairness and transparency to which all subjects operating within Colorobbia Italia S.p.A. must comply.

In order to achieve the Company's objectives it is required to operate in a context of fairness, compliance with the established rules and respecting the interests of customers, citizens, employees, suppliers and partners. Employees are therefore required to comply with and enforce the ethical principles defined by the Company in the context of their duties.

Through the same Code, the subjects are oriented on the various lines of conduct to be complied with and responsibilities and possible disciplinary measures are identified.

The recipients of this Code are, without exception:

- All members of the Board of Directors and Board;
- All employees;
- External collaborators and suppliers involved in working relationships with the Company;

Violation of this regulation undermines confidence and provides for penalties and/or disciplinary measures.

### Dissemination

The Code of Ethics is disseminated to the Recipients through various initiatives to propagate and make known the principles and values that must be complied with. The Company undertakes to promote adequate knowledge of the Code itself by disseminating it through appropriate communication and awareness-raising activities in order to align the behaviour of employees with the ethical and moral values contained therein.

The reference principles to which Colorobbia Italia S.p.A. must always comply are listed below:

- Sharing the interests of the Company by respecting the laws and regulations in force through fair and correct behaviour and pursuing the Company's reference values;
- Complying with the organisational and management rules, optimising costs and using the available resources responsibly;
- Avoiding and discouraging any action and situation that is contrary to corporate interests;
- Taking care of the corporate image even during daily activities, avoiding incorrect behaviour;
- Recognising human resources as important within the Company, for the management of change, evolution and business effectiveness. Respect for the profession by all employees must be ensured through;
- Encouraging conduct that is open to innovation and able to satisfy and understand the needs of employees and customers;
- Enhancing the professional and personal growth of employees, through the planning of training and inter-company transmission of information;
- Guaranteeing fundamental human and trade union rights and international labour standards.



# General principles

Each recipient carries out his or her work in compliance with current legislation, with diligence, professionalism and fairness, making the best use of the means and time available, assuming, depending on the role covered, the responsibilities deriving from their actions and/or omissions.

### Lawfulness

The activities are conducted in compliance with the law, regulations, statutory provisions and applicable European community regulations. Conduct that complies with the criteria of transparency, honesty and ethical integrity is used, rejecting all forms of corruption and illegal practices, inspiring its decisions and behaviour to safeguard the public interest.

Conduct in contrast with current legislation, the Code of Ethics or internal rules of conduct, implemented by any person, within the scope of their functions and responsibilities, even if motivated by the pursuit of an interest of the Company, can in no way be considered justified and determine the adoption of sanctioning measures by the Company.

### Integrity and moral legitimacy

Colorobbia Italia S.p.A. respects people's fundamental rights, protecting their integrity and moral legitimacy. These values are considered the basis of every internal and personal behaviour, which involves all employees.

### Honesty and fairness

In every activity that involves the Company, honesty is the reference value: the relationships between the parties must be based on fairness, collaboration and mutual respect. The actions of each must respect the bonds of sincerity, transparency and loyalty to the organisation and its components. Even with regard to relations with other operators, we refrain from conduct contrary to European community or national provisions protecting free competition.

### Confidential information and personal data

Within Colorobbia Italia S.p.A. the complete compliance with the law regarding the processing of personal data is protected and the confidentiality of the information is also ensured, which must be kept and used for purposes exclusively related to one's work activity.

Employees who process data and information for the performance of their duties are required to observe the internal regulations and privacy rules as prepared and updated. For those who do not comply with the regulation, disciplinary, criminal and administrative sanctions are envisaged.

### Corruption and conflict of interest

The Company pursues the objective of avoiding any phenomenon of corruption and/or conflict of interest deriving from unlawful conduct. Any situation of conflict of interest between family economic activities and tasks within the Company must therefore be avoided. Employees, managers and collaborators cannot accept any type of good, service, money or performance from internal or external subjects that go beyond the common relationships of hospitality and courtesy. Any non-compliant situations will be reported to superiors or to the Company Management.

### Information and transparency

Colorobbia Italia S.p.A. undertakes to transmit the necessary information concerning the Company's performance and news. The recipients of the Code are not allowed to use confidential information found in the work context for purposes related to other activities.



### Social responsibility

Colorobbia Italia S.p.A. believes that its activities, in order to be considered responsible, must pursue objectives of safeguarding human rights, our planet and the well-being of the community, with the desire to promote human development in a fair and sustainable way. Colorobbia Italia S.p.A. also operates in compliance with labour rights, trade union freedom, the protection of dignity, health and safety in the workplace. It repudiates all forms of discrimination, forced labour, child exploitation and all forms of corruption. Companies and all their employees/suppliers must not be involved in illegal activities, whether for the purpose of terrorism or that may involve receiving stolen goods, money laundering or using the proceeds of criminal or illegal activities. The Company refrains from maintaining relations of any kind, with natural or legal persons who are known or suspected to be part of or carry out support activities in any form in favour of criminal organisations, including those of a mafia nature, those dedicated to human trafficking, the exploitation of child labour, illicit trafficking of products of all kinds and subjects or groups that operate for terrorist purposes.

### Centrality of the person, equal opportunity and fight against discrimination

In line with its ethical vision, Colorobbia Italia S.p.A. guarantees compliance with the law regarding the physical, moral and cultural integrity of each person. It is committed to promoting initiatives that allow employees to increase their work and personal skills. The Company supports and respects human rights in its activities, promotes the same opportunities for the development of people while protecting their privacy. Colorobbia Italia S.p.A. is also committed to respecting the diversity of individuals and stimulates inclusion with the belief that it can be a resource. The Company does not tolerate discrimination or exclusion in relation to culture, ethnicity, nationality, religious belief, race, political opinion, marital status, pregnancy, gender and sexual orientation, gender identity and/or expression, health or disability.

### Environment, health and safety

Colorobbia Italia S.p.A. pursues the protection of environmental values in a conscious way, adapting to the requirements of the law and adopting a behaviour that complies with the principles that protect the territory in all its aspects. Maximum attention is paid to both the activities carried out by the Company that have a direct environmental impact

and to operations that influence the environment indirectly, orienting each process towards the achievement of high environmental quality standards.

In observing its principles regarding respect for the environment, Colorobbia Italia S.p.A. undertakes to:

- **Maintain compliance** with all applicable legal requirements concerning environmental aspects;
- **Pursue continuous improvement** aimed at reducing negative environmental impacts by operating with the best available and economically feasible technology;
- **Assess in advance the environmental impacts** of new processes and modifications of existing plants;
- Reduce the use of **hazardous substances**;
- **Ensure the ability to intervene in emergency situations** generated by the Company's activities to cancel or minimise negative impacts on the environment.

The Company guarantees the protection of the health and safety of workers also through continuous attention to potential internal improvements. The working conditions of employees must be suitable in order to ensure physical and moral integrity with the utmost respect for individual dignity.

In compliance with current legislation, adequate systems are maintained to ensure healthy working conditions and to limit any type of accident.

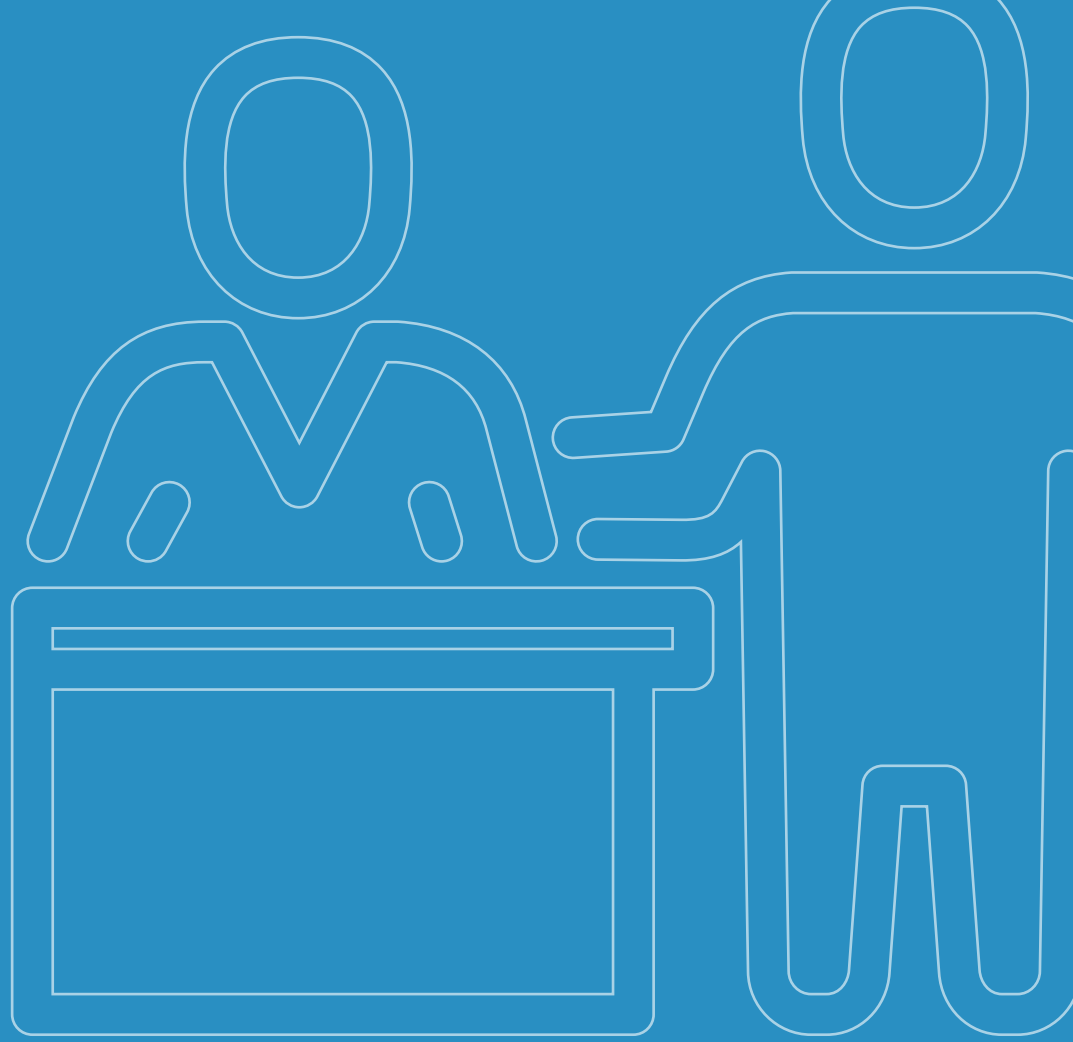
It is mandatory to use personal means of protection suitable for the role played in such a way as to avoid accidents of any magnitude. It is also necessary to maintain an appropriate behaviour in different business contexts that avoids any kind of danger to oneself and to others.

Particular care must always be taken when using machinery, systems and tools. Maintaining responsible and vigilant conduct during the performance of one's duties is essential.

The Company also operates respecting the local community and supporting initiatives planned in the area that have cultural and social value.

### Labour rights

Colorobbia Italia S.p.A. guarantees the freedom of association of workers and recognises the right to collective bargaining. The Company ensures that it does not use forced and compulsory labour or child labour. It denies all forms of discrimination in recruitment policies, in the management of human resources and prevents all forms of mobbing and exploitation of labour.



# Principles of conduct

This part of the document explains the rules of conduct to which the recipients of the code must comply in order to comply with the principles and spirit of the Company.

### Relations with companies of the Group

Given the Company's complexity at the production-operational level and the multiple interlocutors, the management of relations with all the subjects who enter into relations with Colorobbia Italia S.p.A. is of primary importance. The Company promises to meet the commitments made with the Company and deadlines, promptly communicating any problems or necessary information.

### Conflict of interest

In every area and market activity, current regulations and the criteria of substantial correctness are respected.

### Relations with employees

Employees are all those who have an ongoing relationship with the Company.

Human resources are considered an indispensable element by the Company, for its functioning and efficiency. Workers' skills and competences must be valued so that everyone can express their potential and, for this reason, managers are involved in the processes of selection, recruitment and management of human resources without any discrimination. Employees are required to operate according to the criteria of honesty, integrity and transparency, as well as to comply with the regulations and behave with decorum and dignity. The recipients of the Code are obliged to report any situations of conflict of interest. They are also required to act impartially.

Conflict of interest can be generated by:

- Carrying out personal work activities with financing bodies, customers, suppliers, competitors;
- Acceptance of money from persons, companies or entities that are in business relations with the Company.

Anyone who becomes aware of such situations is required to notify their superior or the Company Management.

### Gifts, largesse and donations

It is not allowed to offer, directly or indirectly, payments, benefits and advantages to public officials, public employees or private individuals to influence decisions of any kind. Personnel must not accept, promise, offer money, material benefits or other benefits other than acts of courtesy. If you witness or are involved in acts of this type, you are obliged to notify your superior or the Company Management.

### Protection of physical and moral integrity

Colorobbia Italia S.p.A. is committed to ensuring a working environment that complies with safety and health regulations and everyone must collaborate to reduce risks and improve working conditions. Everyone must participate to maintain

an orderly, safe and clean work environment, respect colleagues and their personality without any discrimination or distinction.

### Transparency and completeness of information

It is the Company's objective to produce information as complete, transparent and exhaustive as possible addressed to the employee about their situation. Measures are also used to respect the privacy of each individual in the Company. All recipients of the Code must guarantee truthfulness, transparency, accuracy and completeness of information, documentation, during the performance of the activities of competence. We condemn any action aimed at altering the correctness and truthfulness of data and information.

### Privacy and confidentiality

Colorobbia Italia S.p.A. ensures the protection of employees' personal data. The confidentiality and secrecy of the information of collaborators and third parties are protected according to the rules provided for by the legislation in force on the protection of privacy. The misuse of confidential information or personal data obtained by reason of one's office goes against Company rules and constitutes a violation of law.

### Selection, training and valorisation of personnel

The achievement of objectives and business efficiency depend on the presence of qualified and competent personnel who constitute an asset of inestimable value. With the aim of maintaining a working environment in line with the requirements of this Code of Ethics, adequate tools are made available for updating and developing new skills and consolidating existing ones. The selection phase is also carried out impartially and enhancing the evaluation of the candidates on the basis of the correspondence of the profiles, avoiding any kind of possible discrimination.

### Company resources

All personnel are required to operate with diligence and respect towards Company assets through responsible and appropriate behaviour.

In fact, the tools and devices made available by the Company must be used in a manner that is appropriate and respectful and not in contrast with corporate interests. The personnel is also authorised to use the various supports only and exclusively for business purposes and related to their employment.

### Relations with the Public Administration

Public Administration means the set of subjects that perform a public function or a public service with which Colorobbia Italia S.p.A. interfaces in the performance of its activities.

This includes territorial public bodies, Municipalities, Provinces and Regions, the Welfare agency (INPS), the National Health Service, the Local Police, Anti-adulteration Nucleus of the State Police (NAS), the Finance Police, etc.

### Correctness and relational transparency

Relations with the public administration must be aimed at maximum transparency and in the spirit of collaboration. Any act contrary to current regulations constitutes illegal behaviour, including false statements, omissions of information, in general any type of deception aimed at obtaining contributions, authorisations or funding. Anyone who works for Colorobbia Italia S.p.A. must immediately report to the Company Management if he or she receives, directly or indirectly, proposals for benefits from public officials, public service officers or employees in general of the aforementioned institutions.

To ensure maximum transparency and traceability of information, Colorobbia Italia S.p.A. undertakes to keep the documentation relating to each transaction or operation through which it has come into contact with the public administration.

### Relations with external collaborators

External collaborators are those who carry out their professional activity with the Company on an occasional or non-continuous basis.

### Selection and valorisation of external collaborators

The selection of external collaborators takes into account their technical skills, reliability, their ability to comply with the Code and the law, as well as the conditions and economic advantages.

### Transparency of the information

All external collaborators in their employment relationship with Colorobbia Italia S.p.A. are responsible for the documentation entrusted to them and must guarantee the truthfulness and transparency of the information provided in the performance of their competence.

### Gifts and largesse

It is forbidden for external collaborators to offer employees, third parties who have employment relationships with the Company, objects as gifts, provision of services, other than the commercial acts provided for in the workplace, which therefore create situations of undue advantage.

### Company resources

All employees are responsible for the resources and tools entrusted to them and must use them responsibly and

appropriately, avoiding damage and conflicts with the interests of the Company.

### Health and safety of collaborators

Colorobbia Italia S.p.A. is committed to ensuring that the health and safety of its external collaborators is protected, it also informs about the risks they may encounter in the areas in which they perform their services for the Company.

### Remuneration

The remuneration to be paid to collaborators must be commensurate with the service identified in the contract.

### Relations with suppliers

Suppliers are all those that Colorobbia Italia S.p.A. uses to acquire goods, services or resources necessary for the performance of its activities.

### Fairness, good faith and respect for values and principles

The Company's relations with its suppliers are based on principles of fairness and transparency.

### Selection and payment of suppliers

The selection of suppliers is based on principles of transparency, correctness, impartiality, punctuality and quality in constant compliance with EU, national and Company regulations that may be applied. The remuneration will be commensurate with the service indicated in the contract.

### Gifts and largesse

It is forbidden for suppliers to offer directly or indirectly to the employees of Colorobbia Italia S.p.A. and their relatives, money, objects and services other than those provided and not appropriate to the circumstance.

### Health and safety of suppliers

Colorobbia Italia S.p.A. is committed to ensuring that the health and safety of its suppliers is protected, informing them of the risks they may encounter in the areas in which they perform services for the Companies. Colorobbia Italia S.p.A. also seeks, through the use of preventive actions, to limit all possible accidents and risks.

### Relations with customers

Customers or clients are those who request services and products from the Company by means of a contract

that provides for reciprocal obligations. The Company strives to achieve a high level of efficiency of the products, is committed to satisfying the requests of each customer, making itself available through clear and transparent communication. Colorobbia Italia S.p.A., consistently with its ethical principles promotes, fair treatment among customers.

### Quality, transparency and fair negotiation

Customer satisfaction is the basis of a solid relationship, which is why the Company strives to:

- Identify the needs of customers to achieve their maximum satisfaction;
- Maintain the high quality of its products and the search for continuous improvement in relation to customer requests;
- Improve the quality of production processes in order to meet the needs expressed by internal or external customers.

Colorobbia Italia S.p.A. does not maintain relations, direct or indirect, with subjects whose membership of criminal organisations or operating outside the lawfulness is suspected. The contracts stipulated with customers are based on criteria of simplicity, clarity and comprehensibility, avoiding the use of any misleading practice.

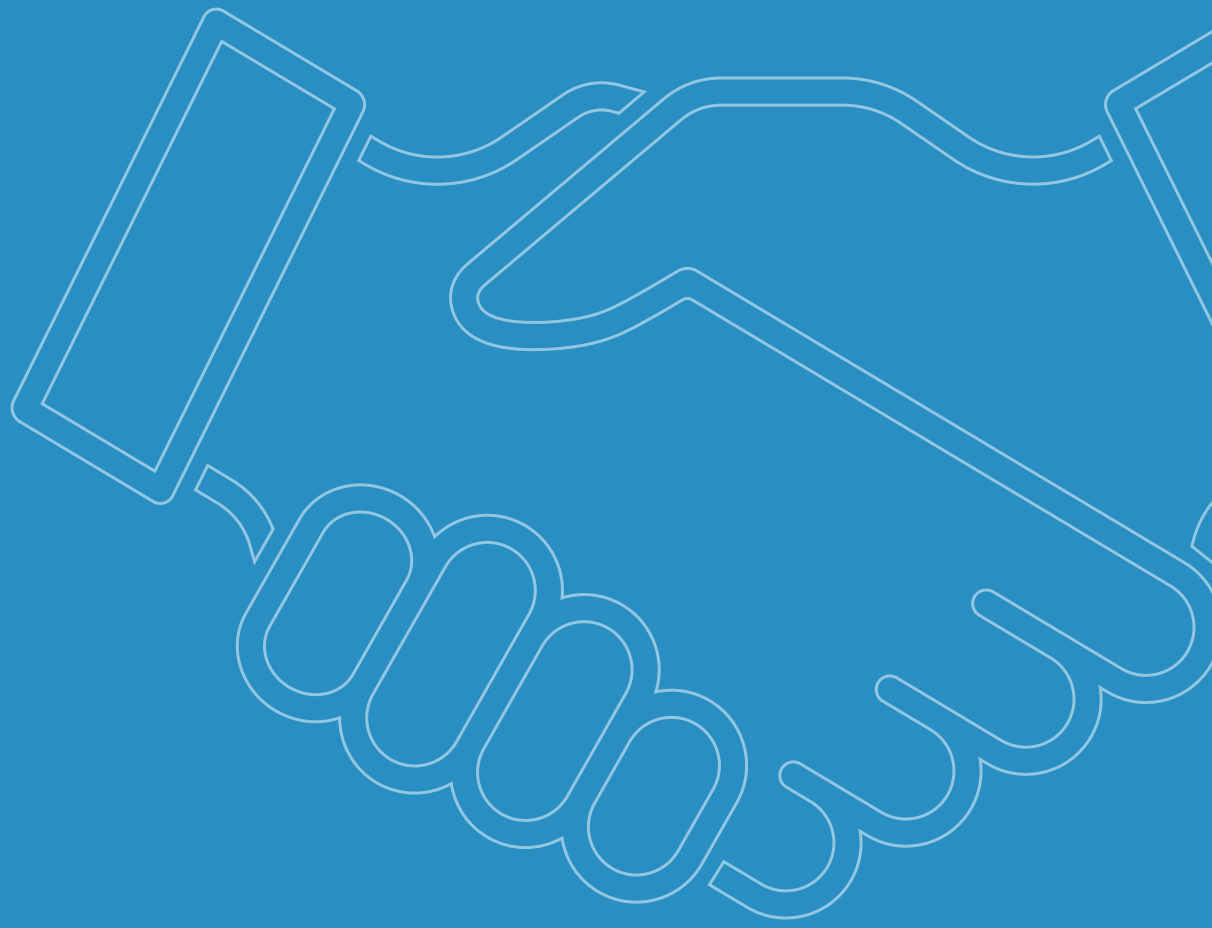
### Gifts, largesse and donations

It is absolutely forbidden to offer or receive, directly or indirectly to/from customers, gifts and/or benefits that can be interpreted as aimed at obtaining an advantage, even non-economic, contrary to mandatory laws, regulations and the principles of this Code.

### Relations with the community

Colorobbia Italia S.p.A. contributes to the support of various cultural and social initiatives that make it possible to promote fundamental principles, also favouring the socio-economic development of the communities of reference. Companies promote compliance with laws and regulations that aim to protect the environment by encouraging environmental sustainability behaviours and policies.





# Actuation and compliance with the code

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All recipients are required to comply with the provisions of the Code of Ethics itself. Compliance with the principles of the Code must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of current regulations (article 2104 of the Italian Civil Code “diligence of the employee”).

The Company Management is the guarantor of compliance with and implementation of the rules laid down in the Code and has the following functions:

- To clarify interpretative doubts;
- To collect reports of violations through the internal portal;
- To carry out investigations and ascertain the appropriate penalties;
- To guarantee the confidentiality of the identity of the reporter.

Employees may contact the Company Management at any time in order to request clarifications and/or information regarding the interpretation of the Code of Ethics, the legitimacy of a behaviour, as well as their appropriateness or compliance with the Code of Ethics.



# Breaches and penalties

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The violation of the principles established in the Code compromises the fiduciary relationship between Colorobbia Italia S.p.A. and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

Disciplinary measures for violations of the Code are adopted by the Company Management, based on reports and in accordance with the laws in force and with the related national or Company employment contracts.

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within the scope of their respective roles and functions within the Company. All subjects are invited to report to their direct superiors the facts and circumstances potentially contrary to the principles and requirements of this Code.

### **Approval and compliance with the code**

This Code is subject to approval by the Company Management of Colorobbia Italia S.p.A., which undertakes to disseminate the Code to all recipients.