

Effepierre S.p.a.

CODE OF ETHICS

Annex to the Model of Organization and Management extended to all types of criminal offence as per D.Lgs. n. 231/2001

Date: 09/04/2020

Approved by the Board of Directors on: 9th April 2020

Signature of the Chairman of the Board of Directors:

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GENERAL STATEMENT

This document was drawn up by the organization, in line with its policy, in order to regulate the principles of conduct and action that must govern the activities of each director, manager, employee and collaborator of the Company.

The application of these principles constitutes a condition for being part of **Effepierre S.p.A.**

The undersigning of the values and principles contained in this document is also an essential prerequisite for establishing partnerships and relationships of collaboration in various capacities with third parties.

IMPORTANCE OF CONTINUOUS IMPROVEMENT

In order to continue being a leader and successfully face the challenges of the global market, in the coming years, **Effepierre S.p.A.** shall continue to pursue excellency. To be an excellent company means ensuring the satisfaction of all stakeholders involved: employees/collaborators, clients, suppliers, shareholders and investors, within a framework of economic, social and environmental sustainability.

In particular, **Effepierre S.p.A.** bases its ethical principle on the continuous improvement of health and safety conditions in the workplace and on the protection of the environment. This aspect is fundamental in the systemic management of the company, since it allows a reduction of unwanted events (e.g. near accidents, accidents, injuries, environmental emergencies...) to the advantage of greater work efficiency, the direct consequence of which is evident within the context of the company's everyday life, wherein employees can operate in a healthy environment, in the certainty that any risks are constantly managed, with greater reliability and quality.

To guarantee what stated above, compliance with the provisions of this Code of Ethics and the predisposed Organizational Model is fundamental.

CODE OF CONDUCT

The code of conduct below lists the key points that all our collaborators must abide by, in order to work with passion, enthusiasm and positive energy.

Professional commitment

It is necessary to allow all internal and external collaborators to exercise their skills, to make use of their experiences and to improve themselves over time - also thanks to opportunities for professional training

and constant development in order to better carry out their tasks. An adequate professional commitment at all levels is essential in order to achieve the company's objectives.

Respecting people

When carrying out company activities, the integral development - both professional and individual - of each person is of the utmost importance. **Effepierre S.p.A.** achieves its objectives by promoting a healthy and safe working environment in full respect of its employees and their needs (health protection, reconciliation between personal and working life, enhancement of skills...). Respect is also expressed through the protection of the person's physical and moral integrity, as defined in the Principles of Action (see page 9).

Integrity

When building a professional activity, reliability and honesty are the basis towards both internal and external collaborators and in relations with third parties, whatever the local practices are.

The dedication to one's work must not pursue personal interests, but the shared objectives of **Effepierre S.p.A.** in compliance with the principles set out in this document. **Effepierre S.p.A.** is committed to spreading the culture of respecting the environment, the territory and health, through the implementation of the appropriate procedures.

Loyalty

Righteousness and fairness are required in all relations with superiors, colleagues, subordinates and external collaborators. It implies compliance with the provisions and internal regulations of **Effepierre S.p.A.** and adopting an attitude of transparency towards everyone and in all instances.

Participation

It is essential that each person display a sense of responsibility, within his/her own professional field, with the aim of excluding individualistic behaviours and encouraging teamwork and mutual collaboration, contributing in a positive and constructive way to the achievement of the set goals. The Company rejects management or operational methods that favour personal satisfaction over the general interest of **Effepierre S.p.A.**

PRINCIPLES OF ACTION

Effepierre S.p.A. has defined the principles of action that govern the activities of all its directors, managers and employees when performing their duties.

The objective is to be competitive on the market, working in a professional and economically sensitive way in order to offer products of extreme quality with the added value of respecting the law, the environment and the health and safety in the workplace. The Company plans its activities and monitors the results in compliance with the principles of transparency in the corporate administrative accounting responsibilities.

Compliance with the laws

Effepierre S.p.A. applies, in every field, the laws, regulations, rules that are applicable to its own reality, in order to achieve its objectives regarding quality, health and safety, environmental protection and continuous improvement.

Each employee, whatever the qualification, is aware of and is trained and informed about the legal implications relating to his/her activity. The company periodically communicates through scheduled internal courses and the provision of documents for office staff on the company's intranet network and by posting on the notice boards in order to inform people about the legislative implications related to their activities or resulting from failure to comply with the imposed rules.

In particular, **Effepierre S.p.A.** prohibits deliberately taking advantage of any gaps or deficiencies in laws and regulations if the result is non-compliance with the Company's rules.

Furthermore, the company has established the means and resources necessary for the training of its workers concerning the requirements of the law.

Respecting health and safety in the workplace

The Organization defines a policy to ensure the best possible protection of health and safety in the workplace and the prevention of any potential forms of risk, in the context of continuous improvement. This policy is applied equally to both its own employees and employees of outside companies, in the cases when they are engaged in work at the Company's sites.

In order to develop and check compliance with the management of Health and Safety, the Company relies on an implemented system, based on the shared and updated Risk Assessment Document. All

employees, collaborators and third parties are required to strictly comply with all the measures required by the procedures and internal regulations of **Effepierre S.p.A.**, in terms of Health and Safety in the workplace, drawn up and updated in accordance with current legislation; in particular, everyone is required to report to their immediate superior any observations relating to problems or possible improvements.

Respecting the environment and the community

The Organization actively promotes the protection of the environment.

Effepierre S.p.A. has always been committed to preventing any risks that should arise for the population and the environment within its supply chain, not only in compliance with current environmental legislation, but also taking into account the development of scientific research and the best experiences in this field.

Effepierre S.p.A. intends to conduct its investments and its development in an environmentally sustainable way, respecting local communities, committing to optimizing its consumption of raw materials, water and energy, and reducing its pollutant emissions and the impact of its activities on the climate.

Relations with suppliers

When entering into a contract with a supplier, the relations must always be based on extreme clarity and on principles of transparency and independence.

The choice of the suppliers and the purchase of goods and services are made on the basis of the objective assessment of the supplier's competitiveness, quality, possession of technical/professional requirements, cost-effectiveness, price, integrity, reliability. The choice of contractors and subcontractors must be carefully evaluated, in order to guarantee all the requirements regarding health and safety in the workplace, with a view to preventing environmental pollution, as well as in regards to tax and social security compliance with particular reference to coordination activities. **Effepierre S.p.A.** maintains relations solely with companies in line with environmental requirements, in compliance with the existing legislation in this area.

Relations with clients

Fairness and respect towards clients play a central role in defining objectives. Relations with clients must be based on mutual trust and satisfaction. In particular, towards clients **Effepierre S.p.A.** guarantees its

commitment to providing them with a product of extreme quality, which exceeds their expectations and lasts over time. Only in this sense is it possible to remain competitive on the market.

Protection of company information

Collaborators must be aware of and carry out the provisions established by the Company policies regarding information security, including those of electronic nature, in order to guarantee integrity, confidentiality and availability. Any information obtained by a collaborator in relation to his/her activity is the property of **Effepierre S.p.A.**

The information is processed by **Effepierre S.p.A.** in full respect of the confidentiality and privacy of the interested parties, in accordance with current legislation on the subject. In particular, the Company:

- has defined an organization for the processing of information that guarantees the correct separation of roles and responsibilities;
- requests third parties, who take part in the processing of information, to sign confidentiality agreements.

Collaborators who acquire information not in the public domain must employ the utmost caution and care when utilizing such information and avoid disclosing it to non-authorized persons, both inside and outside the company. This obligation shall remain in place even after the termination of the employment relationship, whatever the reason.

Protection of company assets

All collaborators are required to operate with due diligence to protect company assets, both physical and intangible, through responsible behaviour and in line with the operating procedures designed to regulate their use, accurately documenting how they are employed. In particular, each collaborator must:

- use the assets entrusted to him/her scrupulously and sparingly;
- avoid improper and/or personal use of company assets that may cause damage or reduction in efficiency or, in any case, in contrast with the interests of the company.

In regards to IT applications, each employee is required to:

- scrupulously adopt the provisions of the company's security policies, in order to not compromise the functionality and protection of the IT systems;

- read and accept the provisions of the “IT Data Management” of Effepierre S.p.A.;
- not browse websites with indecent and offensive content and in any case unrelated to one's own working activity.

Corporate social responsibility

Effepierre S.p.A. is committed to maintaining transparent and fair relations with its stakeholders: clients, suppliers, institutions and the local community.

All employees, collaborators and suppliers are required to scrupulously comply with the measures established according to the procedures and internal regulations of **Effepierre S.p.A.**, drawn up and updated in compliance with current legislation. The company is committed to selecting suppliers on the basis of their compliance with the legislative prerequisites, as well as through an objective assessment of the supplier's competitiveness, quality, possession of technical requirements, cost-effectiveness, integrity and reliability.

In regards to the development of its international business activities, **Effepierre S.p.A.** protects and promotes human rights, imperative for building societies founded on the principles of equality, solidarity, rejection of war and for the protection of civil and political rights, social, economic and cultural rights and so-called third generation rights: the right to self-determination, peace, development and environmental protection. With a view to social responsibilities, it promotes a balance between work and private life, respecting the commitments of employees outside the workplace.

Sustainability

Effepierre S.p.A. is committed to developing a way of living that respects the cycles of the environment wherein the company carries out its activity without compromising the local community's ability to enjoy a healthy and prosperous environment.

Aware of the influence, albeit indirect, that the company may have on the context in which it operates, on the economic and social development as well as on the general well-being of the community, **Effepierre S.p.A.** is committed to spreading the culture of sustainability and social responsibility within the company and through communication addressed to suppliers and business partners. It is committed

to simultaneously creating competitive value for the company and its shareholders, for stakeholders and the local area. Considering sustainability from a social perspective, the company safeguards individual freedom, in all its forms, and rejects any type of discrimination and violence, forced labour and child labour.

At every stage of the production and work cycle, we are always careful to comply with the 17 Sustainable Development Goals of the 2030 Agenda of the United Nations (UN), the operational program whereby member States and economic and social realities are committed to achieving concrete goals in terms of sustainable development through the Harmonization of Economic Growth, Social Inclusion and Environmental Protection.

The FPR Green Evolution Project Brand is a clear indication of our daily commitment to Sustainability. A concrete process, destined to grow over time and in terms of initiatives, as we are convinced of the need to offer our clients the utmost reliability of a brand that is able to combine the greatest creativity and innovation with the compliance with the highest standards of environmental sustainability and with ethical and social codes.

For us, being sustainable also means safeguarding professional relationships with our collaborators/employees and our external partners, the lifeblood of our company.

Protection of trade union freedom

Effepierre S.p.A. guarantees its employees and collaborators full freedom of association with trade unions, without any interference.

The company union representatives shall not suffer any form of discrimination due to their role and they are guaranteed the use of time and of the company premises to carry out union activities in accordance with the provisions of current legislation and collective bargaining.

Regulated employment, salary and working hours

All workers shall be hired on the basis of a regular employment contract in accordance with the forms made available by national legislation.

The use of irregular or illegal forms of work is prohibited.

Effepierre S.p.A. recognizes the value of collective bargaining and guarantees that its employees and collaborators shall be paid in accordance with the provisions of the current national collective bargaining agreement implemented in the company. In relation to working hours, the Company guarantees

compliance with the regulatory limits and with those of the current and implemented collective bargaining.

Child labour and youth employment

Effepierre S.p.A. does not employ and rejects child labour.

Furthermore, as a general rule it does not employ underage workers; if, in full compliance with national and international legislation (ILO conventions dedicated to child labour), it should decide to employ underage workers aged no less than sixteen (age limit established by national legislation), it shall guarantee special conditions for the protection of their health and safety, a dedicated path of growth and professional training and will also prohibit their employment during night shifts.

Respecting the principle of non-discrimination

Effepierre S.p.A. rejects all forms of discrimination based on age, sex, race, religion, language, political belief, disability, trade union membership.

Each worker must be employed, trained, promoted and paid exclusively on the basis of job performance. In particular, in order to safeguard the principle of non-discrimination against women, no difference in treatment shall be applied based on the person's sex, thus also guaranteeing equal opportunities and conditions to female employees when accessing top positions.

Compliance with the principles of transparency in accounting, administrative and corporate responsibilities

Effepierre S.p.A. adopts adequate standards of financial planning, control and accounting systems, operating with the utmost accounting transparency. This transparency is based on the veracity, accuracy and completeness of the background information in the accounting records.

Protection of physical and moral integrity

All company staff, whose physical and moral integrity is considered a primary value of the Company, are

guaranteed working conditions that are respectful of the individual's dignity, in safe and healthy working environments.

In particular, the Company shall not tolerate and shall therefore act in order to quell:

- abuse of power: requesting personal benefits and favours as an act due to a superior or adopting attitudes and/or carrying out actions that violate human dignity and especially the autonomy of the collaborator, all constitute an abuse of the position of authority;
- acts of psychological violence: attitudes or behaviours that are discriminatory or prejudicial against people and their beliefs;
- sexual harassment, behaviour or speech that may upset the personal sensitivity of the worker;
- acts of bullying, which can seriously compromise the health of the worker in the workplace;
- operational, horizontal and vertical mobbing which can lead to psychological situations with heavy repercussions on the operational activities of the employee.

Any behaviour that may constitute harassment, sexual and moral harassment, psychological violence, mobbing, straining, discrimination, is an intolerable violation of the dignity of all employees and collaborators; it compromises the physical and mental integrity, the trust and the motivation to work of the victim and may be viewed as a disciplinary offence.

Effepierre S.p.A. guarantees all employees and collaborators the right to be protected from any act or behaviour in contrast with this Code and adopts initiatives aimed at promoting mutual respect in regards to the person's inviolability through training, information and prevention measures. The person who acts in contrast with this Code violates a specific official duty.

Effepierre S.p.A. undertakes to promote general well-being and to eliminate any organizational cause and lack of information that may favour the onset of conflicts and psychological distress, resulting in the so-called organizational mobbing, recognized as a malaise deriving from structural dysfunctions in the organization of work.

Compliance with the rules of free competition and anti-corruption rules ^[1]_[SEP]

Effepierre S.p.A. intends to safeguard the value of fair competition, refraining from illegal behaviour and abuse of the dominant position.

In keeping with the principles of loyalty and integrity, the Company undertakes to take every action aimed at preventing and avoiding any type of illegal behaviour.

Specifically, **Effepierre S.p.A.** prohibits all employees or collaborators from accepting or offering money

or any other form of favour (including gifts or presents that exceed normal forms of courtesy) aimed at producing advantages for themselves and/or the Company.

All relationships with clients and suppliers must be based on the general principles of business ethics.

Economic relations with associations, contributions and sponsorships

In order to guarantee consistency to contributions and sponsorships, management must always be based on the following criteria:

- clear and verifiable allocation of resources;
- authorization by the Chief Executive Officer to manage these relationships for the Company;
- compliance with the applicable code of professional ethics, as well as with the applicable legal requirements.

Conflict of interest

Each collaborator is required to avoid any possible conflict of interest, with particular reference to personal interests.

All employees of **Effepierre S.p.A.** must immediately make a report to a superior regarding any situation that may constitute, generate or even simply appear to be a conflict of interest.

VIOLATIONS TO THE CODE OF ETHICS AND SANCTIONS

Control system

The Code of Ethics constitutes one of the fundamental elements of the Company's control system and is an integral part of the Organizational Model implemented by **Effepierre S.p.A.** in compliance with the Italian Legislative Decree 231/2001.

The internal control system must be oriented towards the adoption of tools and methods aimed at countering potential business risks, in order to establish an adequate assurance regarding compliance not only with the laws but also with internal provisions and procedures.

Management must constantly ensure compliance of conduct regarding what is stated in the Code and, if necessary, carry out specific monitoring programmes.

Compliance with the Code of Ethics, reports on violations to the Supervisory and Control Body

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of art. 2104 of the Civil Code. It must also be considered an essential part of the contractual obligations undertaken by non-subordinate collaborators and/or subjects having business relations with **Effepierre S.p.A.**

The Directors and Managers of the Company are responsible for ensuring that collaborators understand the Company's expectations and translate them into good practices. Managers and Supervisors must therefore ensure that the commitments set out in the Code of Ethics are implemented.

In order to guarantee the effective implementation of the Code of Ethics, **Effepierre S.p.A.** – in compliance with privacy and individual rights laws – has established information channels which may be used by whoever is made aware of any cases of non-compliance with the Code inside the Company to freely and confidentially report them to their Supervisor who shall in turn notify the Supervisory Body. In urgent cases, direct reporting to the Supervisory Body is allowed, either by signed and sealed letter addressed to the attention of the company's Supervisory Body or through the appropriate email address. After being notified of a breach in or an attempted violation of the rules contained in the Code of Ethics, the Company shall be responsible for ensuring that no one in the workplace may suffer retaliation, unlawful conditioning, inconvenience and discrimination of any kind, for reporting to the Supervisory Body the violation of the contents of the Code of Ethics or of the internal procedures.

Dismissals, demotions or other changes in duties, mobbing, adoption of unjustified disciplinary measures, or any other retaliatory or discriminatory measures adopted against the person who has made the report shall not be tolerated in any way.

Furthermore, following the report, the company shall promptly perform all appropriate checks and, if necessary, impose all appropriate sanctions.

The sanction system

The ascertained infringement on the principles established in the Code of Ethics and in the internal protocol procedures compromises the relationship of trust between **Effepierre S.p.A.** and its own managers, employees in general, consultants, collaborators in various capacities, clients, suppliers.

Infringements shall be prosecuted incisively, promptly and immediately, through the adoption – against those responsible for the violations, where deemed necessary for the protection of company interests and compatibly with the existing regulatory framework – of disciplinary and/or sanctioning measures,

adequate and proportionate, regardless of the possible criminal relevance of such behaviours and of the decision to take legal action when these constitute a criminal offence.

The ascertained infringements on the Code of Ethics, after consultation with the Supervisory and Control Body, shall be followed by specific measures, adopted by the Human Resources Department. In coherence and in compliance with the current legal and contractual rules, ascertained violations may also result in the removal from **Effepierre S.p.A.** of those responsible.

Any form of retaliation against those who have reported possible violations of the Code or requests for clarification regarding its application methods also constitute infringement on the Code of Ethics.

The effects of violations of the Code of Ethics and of the internal protocols and/or procedures must be taken into serious consideration by all persons who, for whatever reason, have relations with the Company. To this end, the Company shall circulate the Code of Ethics and the internal protocols and/or procedures. It shall also give information regarding the sanctions that shall be put in place in the event of violations and the methods and procedures for the application of the sanctions.

Effepierre S.p.A., in order to protect its image and to safeguard its resources, shall not entertain relations of any kind with subjects who do not intend to operate in strict compliance with the current legislation and/or refuse to behave in accordance with the values and principles set out in the Code of Ethics and to abide by the procedures and regulations provided for by the annexed protocols.

IMPLEMENTATION OF THE CODE OF ETHICS

This Code of Ethics shall be circulated in the following ways:

- handing in to the Trade Union Representatives (RSU) and to the Workers' Safety Representatives (RLS) to provide them with the necessary information and allow circulation to all workers;
- posting on the notice boards of **Effepierre S.p.A.**;
- distribution to all staff;
- publication on the company's intranet;
- handing to all suppliers;
- adequate and specific training modules.