CODE OF ETHICS

Management and Control Organisational Model pursuant to Legislative Decree 231/2001

Casagrande S.p.A.

Via Arturo Malignani, 1
33074 Fontanafredda (PN)

Current version

Revision 05 of 25.09.2024 - **External social media policy**

Approved by the Chairman of the Board of Directors

Mr. Sergio Casagrande

Signature _____

Revision table

Rev. 04 del 29.02.2024	General update
Rev. 03 del 20.04.2022	Updated predicate offences
Rev. 02 del 27.02.2020	Updated administrative protocol
Rev. 01 del 05.03.2019	General revision
Rev. 00 del 01.03.2018	First issue
Revision	**Revision notes**

Summary

INTRODUCTION 4
1. General principles 5
1.1 Recipients 5
1.2 Commitments of CASAGRANDE 5
1.3 Obligations for all employees 6
1.4 Additional Obligations for Heads of Business Units and Functions 6
1.5 Validity of the Code vis-à-vis third parties 6
1.6 Reference bodies 7
1.7 Contractual value of the Code 7
2. CONDUCT IN BUSINESS MANAGEMENT 7
2.1 General business management 7
2.2 Gifts, presents and other benefits 7
2.3 Conflict of interest 8
2.4 Relations with Suppliers 8
2.5 Customer Relations 10
2.6 Proper use of company assets 10
3. RELATIONS WITH EXTERNAL PARTIES 11
3.1 Relations with Public Institutions 11
3.2 Mass media relations 11
3.3 Social media relations 11
4. CONFIDENTIALITY 12
5. PERSONNEL POLICIES 13
5.1 Human Resources Management and Development 13
5.2 Respect for colleagues 14
5.3 Alcoholic and narcotic substances and other offences 14
6. THE PROTECTION OF WORKERS' HEALTH, SAFETY AND THE ENVIRONMENT 14
6.1 Risk prevention 16
6.2 Checks 16
7. TRANSPARENCY OF ACCOUNTING INFORMATION AND INTERNAL CONTROLS 16
7.1 Accounting information 16
7.2 Internal controls 17
7.3 Anti-money laundering and anti-terrorism 17
8. REPORTING OFFENCES / WHISTLEBLOWING 17
9. ADOPTION, EFFECTIVENESS AND AMENDMENTS 18

INTRODUCTION

CASAGRANDE S.p.A. (hereinafter **Casagrande**) is committed to the highest standards of ethics and fairness in the business conduct. This "Code of Ethics and Business Conduct" (hereinafter referred as the "Code") reflects the business practices and self-discipline principles underlying this commitment.

This Code expresses the ethical commitments and responsibilities in the conduct of the Company's business and activities and defines the set of values and principles, as well as the lines of conduct that must be expected by **Casagrande's** "Directors", by all persons employed by the Company ("Employees"), and by all those who work for the Company, whatever the relationship that binds them to it ("Collaborators").

The Italian national legal system recognises the legal relevance and non-punishability of the adoption of ethical principles and corporate conduct, following the application of the Legislative Decree no. 231/2001 ("Decree") with its additions and revisions ("Discipline of the administrative liability of legal persons, companies and associations, including those without legal personality").

The adoption and compliance with the Code - which is part of a broader internal Management and Control Organisational Model - can take on a value of non-punishability and protection for the benefit of the Company, which, in this case, would remain protected from the sanctions listed in the Decree.

The Code is, therefore, complementary to the existing internal procedures aimed, directly or indirectly, at reducing the risk of committing offences pursuant to Legislative Decree 231/2001 and considers the suggestions included in the special Guidelines issued by Confindustria (approved by the Ministry of Justice on 2 April 2014).

Compliance with the provisions contained therein is to be considered integral part of the contractual obligations undertaken by **Casagrande's** staff, also pursuant to and for the purposes of art. 2104 of the Italian Civil Code. Violation of the provisions of the Code may therefore constitute a serious breach of the obligations arising from the employment contract and a source of tort, with any consequent personal liability.

Likewise, the Company reserves the right to protect its interests in any competent court against third party collaborators (suppliers, agents, consultants and business partners) who have violated the rules of this Code addressed to them and which have been the subject of a contractual agreement with **Casagrande**.

To make public its contents as widely as possible, this Code of Ethics is also published on the company website www.casagrandegroup.com.

The Code of Ethics also constitutes the first safeguard on which the Organisational Model adopted by the Company is based in accordance with the provisions of Legislative Decree 231/2001 (administrative liability of companies and entities for facts constituting offences), of which it is an integral part (violation of the principles and rules contained therein may therefore lead to serious consequences for the Company under the aforementioned legislation).

1. General principles

1.1 Recipients

The subjects to which the rules of this Code of Ethics apply are hereinafter referred to as "Addressees", and are identified in the Directors and members of the corporate bodies, in all the Company's employees and in all those who, directly or indirectly, permanently or temporarily, establish relationships and relations with **Casagrande** itself, or, in any case, work to pursue its aims and objectives, in all the countries in which the Company operates.

The activity carried out by **Casagrande** is compliant with the principles of fairness and transparency. To this end, the operations between the various corporate entities comply with substantial and procedural fairness criteria, according to pre-established principles of conduct for their implementation, adequately brought to the knowledge of the market.

The members of the Boards of Directors are inspired by the principles contained in the Code when setting corporate objectives.

It is first and foremost up to the managers to give concrete form to the values and principles contained in the Code, taking responsibility both internally and externally and strengthening trust, cohesion, a sense of belonging and the spirit of **Casagrande**.

Casagrande's employees, within the scope of due compliance with the law and regulations in force, shall adapt their actions and conduct to the principles, objectives and commitments set forth in this Code.

All actions, operations and negotiations carried out and, in general, the behaviour of the Company's employees in the routine of their work are inspired by the utmost fairness in terms of management, completeness and transparency of information, legitimacy under formal and substantial aspects, and clarity and truthfulness in accounting records in accordance with the laws in force and internal procedures.

Each employee must provide work contributions appropriate to the responsibilities assigned to the professionalism recognised and must act in such a way as to protect the prestige and image of **Casagrande**.

Each Addressee is required to be familiar with the Code of Ethics, to actively contribute to its implementation and to report any shortcomings to the competent reference function (Management, Human Resources Area, Supervisory Body).

In order to ensure full compliance with the Code of Ethics, each employee, if he/she becomes aware of situations that may actually or potentially represent a relevant breach of the Code of Ethics, must promptly report it to his/her direct superior and to one of the reference Bodies referred to in paragraph 1.6 below, or use the Whistleblowing channel referred to in paragraph 8.

1.2 Commitments of CASAGRANDE

Casagrande also ensures through the designation of specific functions ("Reference Bodies"):

1) the maximum dissemination of the Code among the Addressees.
2) the updating of the Code to adapt it to the evolution of civil awareness and regulations relevant to the Code itself.

3) the carrying out of inspections on any reports of violations of the Code's provisions.
4) the assessment of facts and the consequent implementation, in the event of an ascertained violation, of appropriate sanctioning measures.
5) that no one may suffer retaliation of any kind for having provided information on possible violations of the Code or the reference standards.

1.3 Obligations for all employees

Every employee is asked to be familiar with the rules contained in the Code and with the reference standards that regulate the activity carried out within his/her function. **Casagrande** employees are obliged to:

1) refrain from conduct contrary to these rules.
2) refer to their superiors or to Human Resources service in case of need for clarification on how these rules are applied.
3) promptly report to his or her superior or to the Human Resources service any news, either of direct detection or reported by others, concerning possible violations thereof, as well as any request addressed to him or her for the purpose of violating or evading them.
4) in cases of alleged violations of specific gravity, the employee is required to address the report directly to the Management.

1.4 Additional Obligations for Heads of Business Units and Functions

Each Unit/Function Manager is obliged to:

1) to set an example for his or her collaborators by his or her conduct and to direct them to comply with the Code and the reference procedures.
2) work so that employees understand that compliance with the rules of the Code, as well as with the procedures and safety rules, is an essential part of the quality of work performance and of the working relationship in its ethical dimension.
3) carefully select internal and external collaborators, insofar as it is within their competence, to avoid assigning tasks to persons who do not give full reliance on their commitment to comply with the rules of the Code and procedures.
4) take immediate corrective measures when required by the situation.

1.5 Validity of the Code vis-à-vis third parties

All **Casagrande's** employees, according to their competences, within the framework of their relations with external subjects, must:

1) adequately inform them about the commitments and obligations imposed by the Code.
2) demand compliance with the obligations that directly concern their activity.
3) take appropriate internal and, if within their competence, external initiatives in the event of failure by third parties to comply with the Code.

1.6 Reference bodies

Reference bodies for the application of the Code are:
the Management and the Human Resources Department (and consequently the Supervisory Body pursuant to Legislative Decree 231/2001), with the task of promoting the knowledge of the Code within **Casagrande**, providing the necessary explanations and training guidelines and, if necessary, taking the appropriate sanctioning measures in the event of breach of the Code, as well as examining reports of possible breaches, promoting the most appropriate investigations and checks.

1.7 Contractual value of the Code

The Code constitutes an integral part of the regulations of the employment relationship. Compliance with the rules of the Code must be considered an essential part of the obligations of **Casagrande's** employees.
Any breach of the rules of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences, including regarding the preservation of the employment relationship, and may lead to actions for compensation for damages caused by the same breach.
For Addressees who are not employees, compliance with the Code is an essential condition for the continuation of the professional/collaborative relationship existing with **Casagrande**.

2. CONDUCT IN BUSINESS MANAGEMENT

2.1 General business management

Casagrande in business relations is inspired by the principles of loyalty, fairness, transparency, efficiency and openness to the market.
Casagrande's employees and external collaborators acting in the name of or on behalf of **Casagrande** itself, are bound in business relations of interest to the company in relations with the Public Administration, to behave ethically and in compliance with the law, marked by transparency, clarity, fairness, efficiency in commercial and promotional relations and relationships and by the explicit and binding prohibition to resort to illegitimate favouritism.
Recipients are also required to behave in line with **Casagrande's** corporate policies, which can never result, even if aimed at pursuing the corporate purpose, in acts contrary to the law, the regulations in force, or the corporate procedures adopted with reference to individual functions.

2.2 Gifts, presents and other benefits

In relations with Customers, Suppliers and third parties in general, offers of money, gifts or benefits of undue real or apparent advantages of any kind (e.g. promises of economic advantages, favours, recommendations, promises of job offers, etc.) are not permitted. In any case, acts of commercial courtesy are permitted provided they are of modest value and, in any case, such as not to compromise the integrity and reputation and not to influence the Recipient's autonomy of judgement. The Addressee who receives gifts of any kind and of any value, shall notify his/her direct superior or one of the Reference Bodies referred to in point 1.6.

2.3 Conflict of interest

The Addressees must avoid situations and/or activities that may lead to conflicts of interest with those of **Casagrande**, or that may interfere with their ability to make impartial decisions, in safeguarding the best interests of the Company itself.

Should an objective situation of conflict with **Casagrande's** interests arise, the Addressee must immediately inform his/her superior and one of the Reference Bodies and refrain from any activity related to the situation that is the source of the conflict.

In relations between **Casagrande** and third parties, the Addressees must act according to ethical and legal standards, with an explicit prohibition to resort to illegitimate favouritism, collusive practices, corruption or solicitation of personal advantages for themselves or others.

Recipients are required to promptly report to their superior and/or one of the Reference Bodies any information that may suggest or foresee a situation of potential conflict of interest with **Casagrande**.

By way of example and without limitation, the following situations may give rise to conflicts of interest:

1) having economic and financial interests (significant ownership of shares, professional appointments, etc.) also through family members, with customers, suppliers or competitors.

2) carrying out work activities, including by family members, with customers, suppliers or competitors.

3) accepting money, gifts or favours of any kind from persons, companies or entities that are or intend to enter into business relations with **Casagrande**.

4) use one's position in the company or the information acquired in one's job in such a way as to create a conflict between one's own interests and those of the company.

2.4 Relations with Suppliers

The selection of Suppliers and the preparation of the conditions of purchase of goods and services for the company is dictated by values and parameters of competition, objectivity, fairness, impartiality, fairness in price, quality of the good and/or service, carefully assessing the guarantees of assistance and the panorama of offers in general.

Purchasing processes must be marked by the pursuit of the maximum competitive advantage for **Casagrande** and by fairness and impartiality towards any Supplier meeting the requirements. Furthermore, the cooperation of Suppliers shall be pursued to constantly ensure the satisfaction of the Company's customers' needs in terms of quality and delivery times.

The stipulation of a contract with a Supplier must always be based on relations of extreme clarity, avoiding, where possible, the assumption of contractual obligations that entail forms of dependence towards the contracting Supplier.

The need to pursue the maximum competitive advantage for **Casagrande**, however, must necessarily ensure that the company itself and its Suppliers adopt operating solutions in line with the regulations in force and, more generally, with the principles of protection of all the people involved, of the products, of health and safety and of the environment.

2.4.1. Respect for fundamental human rights (ILO convention)

In particular, the following Human Rights Standards for social and ethical responsibility in the **Casagrande** Supply Chain must be pursued, also in compliance with the fundamental standards of the ILO (International Labour Organisation) convention, defining minimum requirements for all suppliers. The current version constitutes a fundamental and integral part of any cooperation contract with **Casagrande** and of any related "protocol".

To establish a proper collaboration and partnership, both parties undertake to respect human rights standards and basic ethical principles as well as to comply with the legal regulations in force in the countries concerned. Reference is made to the labour standards of the National Labour Organisation (ILO), which serve as minimum standards:

ILO Convention – Articles 29 and 109: *No Forced Labour*.

Forced labour is not tolerated. Products resulting from forced labour are not accepted by **CASAGRANDE** and its suppliers. The work must be voluntary, which also includes work by persons in detention.

ILO Convention – Articles 87 and 98: *Freedom of Association – Collective Bargaining*.

Every worker has the right to form or join a trade union organisation. The possibility of adherence to collective bargaining agreements between employers' and workers' organisations must be encouraged. Workers' representatives may not be exposed to discrimination.

ILO Convention – Articles 100 and 111: *No Discrimination.*

Workers may not be subjected to any discrimination based on gender, race, ethnic or social origin, religious or political beliefs. Wages must be equalised between men and women.

ILO Convention – Articles 138 and 182: *No child labour*.

Child labour is not accepted. The minimum age for employees and workers is calculated according to local legal regulations. The minimum age cannot be lower than 15 years. Exceptions are only permitted as part of a training programme. Health, development and school attendance may not be jeopardised.

ILO Convention – Article 131: *Payment of Adequate Wages*.

Wages must be sufficient to guarantee the basic needs of the employed and their families, taking into account local living conditions.

ILO Convention – Article 155: *Protection health and safety in the working environment*.

Health and safety protection must be guaranteed within the framework of the legal provisions and customs of the country. Employees must be guaranteed adequate protection. Measures to prevent accidents in the workplace must be guaranteed. The risks of accidents and occupational illnesses must be minimised. Compliance with the above-mentioned criteria must be guaranteed for each production site and must be

certified by internationally recognised companies. This shall be done prior to the establishment of business relations and for the entire duration of the contract without interruption.

Casagrande reserves the right to carry out audits without prior notification or to appoint certified companies to carry them out.

Failure to comply with the code of ethics may result in the termination of the employment relationship.

2.5 Customer Relations

Casagrande pursues its success on the national and international market through the offer of high-quality products and services at competitive conditions and in compliance with the rules protecting competition.

Each Addressee, in the context of relations with customers and in compliance with internal procedures, shall promote maximum customer satisfaction, providing, among other things, exhaustive and accurate information on the products and services supplied to them, to favour conscious choices.

2.6 Proper use of company assets

Each Addressee is responsible for the protection of the resources entrusted to him/her and has the duty to promptly inform the structures in charge of any threats or events harmful to **Casagrande**.

Each Addressee shall:

• work diligently to protect corporate assets, through responsible behaviour and in line with the operating procedures prepared to regulate their use.

• avoid improper uses of corporate assets that may cause damage or reduction of efficiency, or in any case in conflict with the interests of the company.

• obtain the necessary authorisations in the event of use of the asset outside the company sphere.

The growing dependence on information technology requires ensuring the availability, security, integrity and maximum efficiency of this category of capital goods.

Each Recipient is obliged to

• not to send threatening and insulting e-mail messages, not to use low quality language or inappropriate style, not to make inappropriate or undesirable comments that may cause offence to the person and/or damage the corporate image.

• avoid spamming and “chain letters”, which may generate data/information/process traffic within the company telematic network, such as to significantly reduce network efficiency with negative impacts on productivity

• not surfing on websites with indecorous and offensive content.

• operate on personal social media (Facebook, Twitter, WhatsApp, etc.) in a measured and common-sense manner, carefully avoiding giving, directly or indirectly, a non-positive image of the Company, even representing it in an unfair and improper manner, and jeopardising the privacy of colleagues and anyone connected with the Company itself (stakeholders and shareholders);

• scrupulously adopt the provisions of corporate security policies, in order not to compromise the functionality and protection of information systems.

• avoid loading borrowed or unauthorised software onto company systems. Do not make unauthorised copies of licensed programs either for personal use or for company use or for third parties.

Casagrande prohibits any use of computer systems that may represent a violation of the laws in force, as well as an offence to the freedom, integrity and dignity of persons, especially minors.
The use, even unintentional, of these assets for any purpose outside the company's activity may cause serious damage (economic, image, competitiveness, etc.) to **Casagrande**, with the aggravating circumstance that an improper use may entail potential criminal and administrative sanctions for the company itself for any possible offence and configure the need to take disciplinary measures against the Addressees.

3. RELATIONS WITH EXTERNAL PARTIES

3.1 Relations with Public Institutions

Relations with Public Bodies and Organisations, which are necessary for the development of **Casagrande's** corporate programmes, are exclusively reserved to the corporate functions delegated for such purpose.
Relations shall be marked by utmost transparency, clarity, fairness and such as not to lead to partial, false, ambiguous or misleading interpretations by the public institutional subjects with whom relations are maintained in various capacities.
Gifts, acts of courtesy and hospitality towards representatives such as public officials or persons in charge of a public service are allowed, when they are of modest value and in any case such that they cannot be interpreted by a third party as aimed at acquiring improper advantages. In any case, this type of expenditure must be authorised and adequately documented.
In its relations with public entities for access to subsidised funds, **Casagrande**:
• refuses any behaviour aimed at obtaining the contribution in an undue manner, through deception or omission of due information.
• prohibits the use of the contribution received for purposes other than those for which it was granted.

3.2 Mass media relations

Relations between **Casagrande** and the mass media are the responsibility of the company management and must be carried out in compliance with the defined communication policy and tools.
Any employee of **Casagrande** who receives a request for an interview/release of statements concerning the company from any press or communication organ is required to inform the management in advance and agree with it on the appropriateness and contents of the interview itself.

3.3 Social media relations

Relations between **Casagrande** and the social media must be managed exclusively by the persons expressly delegated to do so and in compliance with the specific procedures and instructions issued by the company.
All recipients are required to use social media in a responsible manner. It must always be considered that actions on social networks can have an impact on the image and reputation of the company. Therefore, comments or discussions concerning the group's activities should be avoided, even if they are posted by third parties or the public.

Moreover, when using their social accounts, employees must use every care to ensure that their opinions or judgements on events, things or people are in no way directly attributable to **Casagrande**.
When using social channels, it is important to always refer to **Casagrande's** external social media Policy.

4. CONFIDENTIALITY

4.1 Protection of business secrets

CASAGRANDE's activities constantly require the acquisition, preservation, processing, communication and dissemination of news, documents and other data pertaining to negotiations, administrative procedures, financial transactions, know-how (contracts, deeds, reports, notes, studies, drawings, photographs, software, etc.) which, due to contractual agreements, cannot be disclosed externally or whose inappropriate or untimely disclosure could damage the company's interests.
Without prejudice to the transparency of the activities carried out and the information obligations imposed by the provisions in force, it is the obligation of **Casagrande's** people to ensure the confidentiality required by the circumstances for each piece of information they learn in the course of their work.
Information, knowledge and data acquired or processed during one's job or through one's duties belong to **Casagrande** and cannot be used, communicated or disclosed without specific authorisation from one's superior within **Casagrande's** organisation, in compliance with specific procedures.

4.2. Privacy protection and EU Regulation 679/2016

Casagrande undertakes to protect information relating to its People to third parties, generated or acquired within and in business relations, and to avoid any misuse of this information.
As provided for in EU Regulation 679/2016, the company guarantees that the processing of personal data carried out within its facilities is carried out with respect for the fundamental rights and freedoms, as well as the dignity of the persons concerned.
Casagrande guarantees that the processing pursues the following principles:

a. **Lawfulness, fairness and transparency** - this means that personal data are processed lawfully, fairly and transparently.
b. **Purpose limitation** - data is only acquired and processed within specific procedures and is stored and archived in such a way that unauthorised persons are prevented from gaining knowledge of it.
c. **Data minimisation** - only data that is necessary and appropriate for the purposes in direct connection with the functions and responsibilities covered are acquired and processed.
d. **Accuracy** - data must be accurate and, if necessary, updated.
e. **Retention limitation** - data shall be retained for a period defined in relation to the type of processing.
f. **Integrity and confidentiality** - **Casagrande** undertakes to adopt suitable and preventive security measures for all databases in which personal data are collected and stored, to avoid the risk of destruction and loss or unauthorised access or processing.

5. PERSONNEL POLICIES

5.1 Human Resources Management and Development

Human resources are a central and indispensable factor for the company's existence. The dedication and professionalism of employees are decisive values and conditions for the achievement of the company's objectives.

Casagrande is committed to developing the skills and competencies of each employee, so that the energy and creativity of individuals finds full expression in the execution and achievement of the objectives contained in the corporate purpose.

Casagrande offers all employees the same opportunities for professional growth, ensuring that everyone can enjoy fair treatment based on merit criteria, without any discrimination. The relevant functions must:

1) adopt merit, competence and in any case strictly professional criteria for any decision concerning an employee.
2) to select, recruit, train, remunerate and manage employees without discrimination of any kind
3) create a work environment in which individual characteristics cannot give rise to discrimination, and in no way to so-called mobbing phenomena. To this end, it implements all initiatives to monitor the corporate climate, enhancing the indicators acquired to work for continuous improvement.

Each Addressee must actively collaborate to maintain a climate of mutual respect for the personality, dignity and reputation of each one.

Recipients are also required to treat personal data, of which they become aware in the course of their work, in the most appropriate manner to protect the confidentiality, image and dignity of individuals.

Casagrande is committed to disseminating and consolidating a culture of work safety, developing sensitivity to the acquisition of a full awareness of risks, promoting responsible behaviour by all collaborators, and working to safeguard, especially with preventive actions, the health and safety of workers.

The company's activities must be carried out in full compliance with current prevention and protection regulations; operational management must refer to advanced criteria of environmental protection and energy efficiency, pursuing the improvement of health and safety conditions at work. **Casagrande** is also committed to guaranteeing the safeguard of working conditions in the protection of workers' psycho-physical integrity, respecting their moral personality, avoiding their being subjected to unlawful conditioning or undue inconvenience.

Casagrande therefore opposes any behaviour or attitude that is discriminatory or damaging to the person, his/her beliefs and preferences (e.g. insults, threats, isolation or excessive intrusiveness, professional limitations).

Casagrande endeavours to ensure that, within the scope of its activities, the rights provided for by the Universal Declaration of Human Rights are guaranteed in Italy and in the various countries where it operates.

Casagrande, in whatever country it operates, rejects the exploitation of child labour. In addition to full compliance with the relevant regulations in each country, the company promotes the protection of workers' rights, trade union freedoms and association rights.
Any violation of the provisions of this article must be reported immediately to the management.

5.2 Respect for colleagues

Casagrande does not allow any kind of harassment towards a colleague, starting with sexual harassment, meaning as such: the subordination of salary or career prospects to the acceptance of sexual favours; it also does not allow proposals of private interpersonal relations, proposed with insistence, despite the express or evident unwillingness of the person involved, which are perceived as disturbing or in any case disturbing.

5.3 Alcoholic and narcotic substances and other offences

Casagrande considers it essential that each employee personally contributes to maintaining a working environment that respects the moral principles and sensibilities of colleagues. It will therefore be considered a conscious assumption of the risk of violating such environmental and behavioural connotations:

a) serving under the effects of the use of alcohol, drugs or substances of similar effect.
b) consuming or disposing of alcoholic or narcotic substances for any reason whatsoever in the course of work, wherever and however performed.
c) smuggling and aiding and abetting illegal immigration. Such conduct will be duly reported and sanctioned.

6. THE PROTECTION OF WORKERS' HEALTH, SAFETY AND THE ENVIRONMENT

The protection of the health and safety of workers in the workplace and the protection of the environment are ethical principles of great significance and cultural depth, even more so following the transposition of numerous European Directives in the sector.

- **Casagrande**, fully shares these principles, aims to "work in safety and for the protection of the environment", i.e. to ensure compliance with prevention standards and the adoption of "safe" behaviour to the benefit of people and the environment.

- **Casagrande** therefore guarantees the psycho-physical and moral integrity of its employees, working conditions that respect individual dignity, and safe and healthy working environments, in full compliance with current legislation on the prevention of accidents at work and worker protection.

- **Casagrande** also carries out its activities under technical, organisational and economic conditions that ensure adequate accident prevention, a healthy and safe working environment and adequate environmental prevention.

- **Casagrande** is committed to disseminating and consolidating a culture of safety and environmental protection among all its employees, developing risk awareness and promoting responsible and safe behaviour by all employees.

In particular, the company is committed to:

⇨ eliminate or, when not possible, reduce health, safety and environmental risks.

⇨ identify risks that cannot be avoided and plan an adequate prevention and protection programme, as well as the control of possible accidents and/or environmental pollution.

⇨ adapt work equipment, facilities and workplaces to the relevant legal provisions.

⇨ provide adequate individual and collective protective equipment to workers.

⇨ provide appropriate instructions to workers and periodically provide training updates on health and safety and environmental protection.

⇨ monitor the application of the prevention and protection measures adopted and the behaviour of workers, to prevent accidents, occupational diseases and environmental incidents.

⇨ comply with the relevant legal obligations concerning the protection of workers' health and safety and environmental protection.

Similarly, workers must ensure compliance with the following rules:

⇨ adopt safe behaviour while working and with care for the protection of the environment, i.e. operate in compliance with company regulations, procedures, instructions, prevention rules in general and this Code of Ethics.

⇨ avoid conduct that is dangerous for oneself or others or for the environment itself.

⇨ respect the orders indicated by hierarchical superiors or the Employer.

⇨ immediately inform their superiors of any anomaly, criticality or other dangerous situation they become aware of during their work.

⇨ comply with assigned tasks and operational assignments.

⇨ cooperate as closely as possible with the activities and instructions of the Prevention and Protection Service.

⇨ participate with attention and involvement in organised training activities.

⇨ cooperate, with responsible behaviour and in compliance with company rules, in the event of an alarm for any emergency.

⇨ undergo the required health surveillance.

⇨ mature full awareness of the implementation of the organisational and management model adopted, collaborating with the figures responsible for achieving the prevention objectives.

Collaborators/suppliers must also ensure compliance with the following rules:

- ⇨ adopt safe behaviour during their activities, i.e. operate in compliance with company regulations, instructions received, prevention rules in general and this Code of Ethics.
- ⇨ respect company signs.
- ⇨ respect the contractual conditions that regulate the relationship between the parties.
- ⇨ in the case of tender, work or supply contracts, comply with the prevention indications resulting from the cooperation and coordination activities between the parties.

6.1 Risk prevention

The company adopts and implements the Organisational and Management Model, which provides for appropriate measures to ensure that activities are carried out in compliance with the law and the rules of conduct of the Code of Ethics, and to detect and eliminate risk situations in a timely manner.

6.2 Checks

Casagrande adopts specific procedures to check the compliance of the conduct of anyone acting for the company or within its sphere with the provisions of the laws in force, with the rules of conduct of this Code of Ethics and of the Organisation and Management Model, as well as of the Work Safety Management System.
Anyone who becomes aware of any breach of the Code of Ethics shall immediately inform the Supervisory Board.

7. TRANSPARENCY OF ACCOUNTING INFORMATION AND INTERNAL CONTROLS

7.1 Accounting information

All activities and actions performed and carried out by the Addressees in the course of their work shall be verifiable. Accounting transparency is based on the truthfulness, accuracy, completeness and reliability of the documentation of management acts and related accounting records.
Each Addressee shall cooperate to ensure that management acts are correctly and promptly represented in the accounts. For each transaction, adequate supporting documentation of the activity performed shall be kept and archived to allow for easy recording of accounts, identification of different levels of responsibility, and accurate reconstruction of the transaction.
Each record must reflect exactly what is shown in the supporting documentation. Addressees who become aware of omissions, falsifications, alterations or negligence in the information and supporting documentation, shall report the facts to their superior or to one of the Reference Bodies mentioned in point 1.6.

7.2 Internal controls

It is **Casagrande's** will, to spread a culture awareness of the importance of an adequate internal control system at all levels of its organisation.

In particular, the internal control system must favour the achievement of the company's objectives and must, therefore, be aimed at improving the efficiency and effectiveness of production and management processes.

All Addressees, within the scope of their functions, are responsible for the correct functioning of the control system.

Everyone must feel responsible custodian of the company assets, tangible and intangible, that are necessary for the activity performed.

7.3 Anti-money laundering and anti-terrorism

Casagrande, in compliance with the relevant regulations in force, endeavours to prevent the use of its economic - financial system for the purpose of money laundering or financing terrorism (or any other criminal activity) by its customers, suppliers, employees and counterparties with whom it deals in the performance of its activities.

Casagrande therefore proceeds to verify with the utmost diligence the information available on its business counterparties, suppliers, partners and consultants, to ascertain their respectability and the legitimacy of their activities, before establishing business relations with them. The company also takes care that the operations to which it is a party do not present, even potentially, the risk of favouring the receipt or substitution or use of money or goods derived from criminal activities.

8. REPORTING OFFENCES / WHISTLEBLOWING

To promote a culture of ethics and legality in the workplace, as well as to create a climate of transparency, **Casagrande** has set up a channel for reporting (also anonymously) any violations or alleged offences committed by persons belonging to the company organisation or having relations with it, so-called "whistleblowing". By accessing the company website, www.casagrandegroup.com on the "Whistleblowing" page, you can view the procedure for sending reports.

Whistleblowers may report or disclose violations or attempts to conceal violations that have occurred or are suspected to have occurred in connection with the following ("Violations"):

A) Crimes and offences relating to, inter alia, the following conduct:
   - Bribery or trafficking in influence.
   - Money laundering, financial, tax and accounting offences.
   - Conflicts of interest.
   - Privacy and protection of personal data.
   - Anti-competitive practices.
   - Trade sanctions, embargoes and export controls.
   - Product safety and compliance.
   - Public health.

- Network and information systems security.
- Environmental protection.
- Consumer protection.
- Corporate tax evasion.
- Fraud.

B) Threat or prejudice to the public interest.

C) Illegal and relevant conducts pursuant to Legislative Decree 231/2001 or serious violations of the 231 Organisational Model and of **Casagrande's** Code of Ethics not covered by the directive or applicable local laws.

D) Violation of applicable laws on moral or sexual harassment, discrimination and violence in the workplace.

E) Failure to respect human rights.

F) Violation of the principle of non-retaliation.

Whistleblowers may report violations that have already occurred or when they have a reasonable suspicion that violations are highly likely to occur.

Without prejudice to cases provided for by applicable national legislation, the Whistleblower must have become aware of such violations during his or her professional activity and, in any case, must have had personal knowledge of them.

The whistleblower/reporter is assured the utmost protection, confidentiality and safeguard against retaliation, unlawful conditioning, inconvenience and discrimination of any kind, for duly reporting a violation in accordance with EU Directive 2019/1937 and Legislative Decree 24/2023.

This reporting channel concerns exclusively the violations referred to in the regulations.

In any case, anonymity is guaranteed as long as the confidentiality of identity is enforceable before the law.

Casagrande's Whistleblowing procedure provides for the sending of reports through an internet platform (CP KEEPER - managed by a third party), the link to which is https://casagrande.cpkeeper.online/keeper/available-configuration-links or can be found on www.casagrandegroup.com on the "Whistleblowing" page.

9. ADOPTION, EFFECTIVENESS AND AMENDMENTS

This Code of Ethics may be periodically studied, updated, amended or revised by the Board of Directors of **Casagrande S.p.A.**

This Code of Ethics is adopted by resolution of the Board of Directors with immediate effect.

Casagrande S.p.A.

The Chairman of the Board of Directors