

robans

COMPANY CODE OF CONDUCT

REVIEWED BY

Management of Robans S.r.l.

APPROVED BY

Board of Directors of Robans S.r.l.

Rev.	Description	Approval	Date
0	1st issue	Board	01/01/2026

1. Introduction

This Code of Conduct defines clear and responsible behaviors that all employees, collaborators, suppliers, and partners of Robans must follow.

The objective is to promote integrity, fairness, and transparency in all activities, safeguarding people, communities, the environment, and the company's reputation. The principles of the Code apply to all company activities and guide professional, economic, and operational decisions.

2. Respect for Fundamental Rights

Robans recognizes the fundamental value of each individual's rights and is committed to ensuring their full protection in all its activities. In line with this principle, every corporate action and decision must be based on respect for dignity, equality, and freedom, ensuring fair and inclusive treatment.

The company strictly prohibits any form of child labor or exploitation and promotes a workplace free from discrimination based on gender, religion, sexual orientation, ethnicity, age, or disability.

Robans is committed to promoting equal opportunities for all, ensuring access to training, professional development, and career advancement. Protecting employees' physical and mental health is a core priority, as is the prevention of harassment, mobbing, and abuse of power, in order to ensure a safe, respectful, and inclusive workplace.

3. Safe, Inclusive and Supportive Work Environment

The company promotes a working environment that values everyone's abilities and ensures freedom from discrimination, harassment, or retaliation.

Health and safety in the workplace are an absolute priority, and everyone is required to comply with internal regulations and applicable laws.

A safe and inclusive environment allows each individual to fully express their potential, strengthening both cohesion and collective well-being.

Any non-compliant behavior must be reported according to the established procedures, in compliance with the principle of protection against retaliation.

See also section 8.2 of the Code of Ethics for specific guidance.

4. Environmental Protection

Robans takes responsibility for reducing the environmental impact of its activities by adopting a conscious and responsible use of resources and promoting sustainable behavior among employees and partners.

This commitment is reflected in compliance with applicable environmental regulations, waste prevention, and the pursuit of continuous improvement in environmental performance, based on the belief that environmental protection is a collective and essential responsibility.

5. Ethics in Relations with Third Parties and Suppliers

All partners and suppliers are required to operate according to ethical principles consistent with those of Robans, based on fairness, transparency, and quality.

Any gift or benefit that could influence business decisions is prohibited. Only modest gifts, compliant with the law and standard business practices, are permitted.

The company promotes a responsible approach in business relationships to ensure that mutual trust and integrity are always preserved.

6. Anti-Corruption and Transparency

Robans condemns any form of corruption, extortion, or abuse of power.

All employees and collaborators are required to act with the utmost transparency, promptly reporting any unlawful behavior, thereby contributing to safeguarding the company's integrity and reputation.

7. Prevention of Conflicts of Interest

All individuals involved in company activities must act exclusively in the interest of the company, avoiding situations that may give rise to personal, professional, or financial conflicts of interest, whether direct or indirect.

If such situations occur or may potentially arise, they must be promptly reported according to company procedures to ensure proper evaluation and management, guaranteeing fairness, impartiality, and transparency in decision-making.

8. Combating money laundering and unfair competition

Robans operates in full compliance with applicable regulations on the prevention of money laundering and terrorist financing and requires all collaborators to pay close attention to suspicious transactions or accounting anomalies, promptly reporting any irregular conduct to company management.

Robans promotes fair, transparent, and responsible competition based on honesty, service quality, and respect for customers, suppliers, and competitors, condemning any unfair, unethical, or aggressive behavior.

The company believes that reputation, trust, and compliance with market rules are essential to building strong and lasting relationships.

9. Confidentiality and Privacy

Robans places the utmost importance on protecting information acquired during its business activities, whether commercial, technical, financial, or related to individuals.

All collaborators are required to handle such information with the highest level of confidentiality, using it exclusively for professional purposes and in compliance with applicable regulations, with particular attention to the General Data Protection Regulation (GDPR) and other relevant laws.

The company promotes a conscious approach to personal data management, including physical, logical, and organizational security measures, controlled access, and clear criteria for data retention and storage.

Privacy protection applies not only to employees but also to customers, suppliers, and partners, and represents a strategic element of mutual trust and corporate reputation.

Robans also encourages the immediate reporting of any data breaches or security risks, adopting

internal procedures to ensure prompt incident management and mitigation.

In this way, confidentiality and data protection become an integral part of the corporate culture and individual responsibility.

10. Implementation and Responsibility

This Code of Conduct is binding for all those who operate, in any capacity, on behalf of Robans.

Any violation of the principles contained herein may result in the application of disciplinary measures or other actions provided for by company procedures and applicable regulations, in accordance with the principles of proportionality and graduality, to ensure compliance with the company's rules and values.