

robans

COMPANY CODE OF ETHICS

VERIFIED BY

Management of Robans S.r.l.

APPROVED BY

Board of Directors of Robans S.r.l.

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1. Introduction

This Code expresses the “ethical principles”, meaning the set of values, principles and rules of conduct governing the business and corporate activities adopted by corporate representatives, employees and collaborators of Robans S.r.l. (hereinafter also the “Company” or “Robans”), including shareholders, directors and employees in any capacity.

The Company believes that ethics in conducting its business is an essential condition for success, a tool for enhancing its reputation, and a fundamental asset.

To this end, Robans S.r.l. has adopted its own Code of Ethics which, in line with the principles of fairness, loyalty and honesty already shared within the company and the LVMH Métiers d’Art group, regulate corporate activities through behavioral standards.

A company acts ethically when it operates in full compliance with applicable laws and embraces the social values underlying our society. It establishes fair relationships with all stakeholders and contributes positively to the social and economic environment in which it operates.

In daily actions and decision-making, everyone must consider not only the interests, rights and duties of Robans, but also those of internal and external stakeholders.

This Code is binding for the Company and all its representatives, employees and collaborators.

Robans also requires its key stakeholders (e.g., affiliated companies, suppliers and customers) to comply with the general principles of this Code within their own operations and in their relationships with Robans, while respecting religious, cultural and social differences.

The Company will not engage in relationships with parties unwilling to comply with applicable laws and/or ethical principles outlined in this Code.

The Code will be published on the Company’s website (www.robans.com) and made available to all stakeholders.

2. Preliminary Provisions

2.1 Definitions

“Code”	this Code and its annexes, as amended from time to time;
“Recipients”	all parties to whom the Code applies, including shareholders, directors, employees, managers, collaborators, suppliers and clients;
“Empolyees”	individuals with an employment relationship with the Company, including temporary or part-time workers;
“Corporate Representatives”	from time to time in office, the Chairman, the Chief Executive Officers, the members of the Board of Directors, of the Board of Statutory Auditors, as well as the members of any other corporate bodies that may be established pursuant to Article 2380 of the Italian Civil Code (as amended by Legislative Decree No. 6 of 17 January 2003) or by special laws, as well as any other person in a top management position, by which is meant any person holding functions of representation, administration or management;
“Managers”	individuals responsible for one or more company areas according to the organizational structure.

2.2 Robans' Activities

Robans S.r.l. was founded in 1989 in Tuscany by the Palmieri family.

For over thirty years, the company has been a benchmark in the luxury fashion sector, specializing in the design and production of leather garments for major global fashion brands.

From a small family-run business rooted in artisanal tradition, Robans has evolved into a modern and innovative company capable of processing high-quality materials with attention to results, development and new technologies.

Robans has always focused not only on product quality but also on respect for people and the environment. Since 2013, it has obtained certifications such as SA8000, demonstrating its commitment to fair and ethical working conditions.

In 2022, Robans joined the LVMH Métiers d'Art group, becoming part of a global network of excellence.

Today, Robans represents both a high-quality supplier and an innovation hub that preserves tradition while looking toward a sustainable and international future.

CORE VALUES OF ROBANS

People and Work Environment

Robans considers people a central element for the company's growth and the achievement of its objectives. Each employee, through their daily commitment, makes a fundamental contribution to the development of the company.

The company respects the fundamental rights of every individual and safeguards their physical, cultural, and moral integrity, valuing diversity as an asset and ensuring equal opportunities without any discrimination.

For Robans, valuing people means creating a work environment that respects everyone's dignity, fostering the development of skills and talents, and recognizing merit and commitment in a fair, transparent, and impartial manner.

Trust

Trust in people is a fundamental value for Robans.

The company was founded, has grown, and has developed thanks to those who, nearly 35 years ago, believed in an innovative project by investing resources, passion, and commitment; to those who still support the company's projects today with their expertise and resources; and to customers who place their trust in Robans, confident in our quality and reliability.

For Robans, trust among the company, managers, employees, and collaborators is essential to achieving corporate objectives. All those who work for Robans must avoid situations or activities that may create conflicts of interest or compromise their independence in decision-making and actions.

Local Area and Community

Robans is deeply connected to the local community where its facilities are located and from which much of its workforce originates. For this reason, the company collaborates with local institutions,

bodies, and associations, striving to ensure that its growth enhances its social reputation and contributes to the economic, cultural, and social well-being of the community.

Maintaining good relations with the local area means integrating business activities with the surrounding environment and social fabric, collaborating with local schools, and supporting organizations and associations by promoting cultural and social events and initiatives.

2.3 Scope and Effectiveness of the Code

The provisions of this Code apply to the recipients, without prejudice to the application of mandatory legal and contractual provisions (including national, territorial, and company-level collective agreements), as applicable from time to time to their relationships with the Company.

This Code also applies to all those who, in various capacities, directly or indirectly, permanently or temporarily, operate in the interest of the Company, as well as to its customers and Suppliers, in accordance with the law or the agreements entered into with them and within the limits set forth in this Code.

The principles and rules set out in this Code of Ethics must be interpreted in accordance with applicable laws and, at company level, are implemented through corporate policies, protocols, and procedures.

2.4 Effectiveness of the Code with Respect to Employees, Collaborators, Managers, and Company Representatives

Directors and managers must be familiar with the Code of Ethics, act in accordance with its principles, and set an example for their collaborators. Employees must comply with the Code of Ethics, which forms part of their contractual obligations pursuant to Article 2104 of the Italian Civil Code.

Violation of the principles of the Code may constitute a breach of obligations or a disciplinary offense and, where necessary, may result in compensation for damages caused to the company, in compliance with applicable laws and collective agreements.

All recipients must comply with the Code of Ethics both in internal relations among colleagues and in external relations with third parties.

Company representatives must be guided by the principles of the Code in the exercise of their administrative and control functions.

Managers must adhere to these principles, ensure that their collaborators comply with them, and act as role models. They are directly responsible for coordinating and supervising their teams, ensuring the prevention of Code violations. They must clearly communicate obligations to collaborators, ensure awareness that violations may constitute contractual breaches or disciplinary offenses, promptly report any violations to superiors or the Supervisory Body, and promote measures to prevent them, avoiding retaliation.

Employees and collaborators must align their conduct with the principles of the Code and the instructions of their managers.

2.5 Effectiveness of the Code with Respect to Third Parties

Anyone who, in the course of their duties, interacts with third parties must inform them of the obligations of the Code, require compliance where relevant to their activities, and report any conduct by third parties that is contrary to the Code or that may induce violations by recipients.

The Company promotes the application of the Code's principles by including contractual clauses requiring third parties to comply with its provisions in their activities and organization.

3. Ethical Principles

3.1 Legality

All activities carried out on behalf of the Company must comply with the laws and regulations of all countries in which it operates. Recipients must be aware of and comply with the applicable rules within their areas of work, avoiding any violations, whether subject to criminal, administrative, or other sanctions. Each recipient undertakes to carefully stay informed about the laws applicable to their functions. In addition to the general principles of diligence and fairness set out in Article 2104 of the Italian Civil Code, each recipient must also comply with the behavioral rules established by applicable collective agreements.

3.2 Integrity

In performing their duties, each recipient must act with moral integrity and transparency, as well as with honesty and good faith.

3.3 Dignity and Equality

Each recipient respects the dignity, privacy, and rights of every individual, both within and outside the company. All individuals work together regardless of nationality, culture, religion, sexual orientation, or race. Discrimination, harassment, or offensive behavior of any kind is not tolerated. Authority in hierarchical relationships must be exercised fairly, without ever undermining the dignity or professionalism of collaborators. The Company is also committed to protecting the privacy and opinions of employees and all those who interact with it.

3.4 Business Ethics

The Company conducts its activities efficiently and in an open market environment, respecting competition and avoiding improper conduct or abuses that could harm customers, partners, or favor personal interests.

3.5 Professionalism and Cooperation

Each recipient performs their work with professionalism, commitment, and responsibility, continuously updating and deepening the necessary knowledge. Cooperation among those involved in the same project or production process is essential, and everyone must contribute to maintaining it both within and outside the workplace.

3.6 Respect for Human Rights

The Company respects fundamental human rights in accordance with the UN Universal Declaration, ILO Conventions, and the UN Guiding Principles on Business and Human Rights. It prohibits forced and child labor, ensures fair, safe, and dignified working conditions, promotes freedom of association and collective bargaining, and prevents discrimination and abuse. These commitments extend to the supply chain, with periodic risk assessments and the adoption of preventive and corrective measures where necessary.

4. External relations

Before entering into collaborations, transactions, or projects with third parties, the Company considers the available information regarding their conduct and reputation and assesses potential risks of corruption or extortion, also considering the country involved, the counterparty's business partners, and the potential effects of the transaction.

4.1 Gifts, benefits, or other Advantages

In the performance of their duties, Recipients are prohibited from offering, granting, accepting, or receiving, directly or indirectly, gifts, benefits, or other advantages that may influence, or appear to influence, corporate decisions.

Only gifts of nominal value consistent with normal business courtesy are permitted, provided they cannot be interpreted as requests for or grants of undue advantages or as unlawful or unethical conduct.

Anyone receiving gifts that do not comply with these rules must promptly inform their manager in writing.

Robans allows donations and sponsorships only if they are not aimed at obtaining undue advantages and are directed toward cultural, social, or sports organizations or initiatives with charitable purposes, in line with the Company's values.

In any case, it is prohibited to make donations or sponsorships that constitute favors to private individuals or public officials in exchange for economic benefits or preferential treatment.

4.2 Relations with Customers, Suppliers, Consultants, Collaborators, Agents, and Business Partner

Relations with third parties are based exclusively on criteria of trust, quality, competitiveness, professionalism, and compliance with rules.

The Company collaborates only with reliable parties with a good reputation, engaged in lawful activities and aligned with the Company's ethical values, also through preliminary checks of available information.

Agreements must be transparent, and secret agreements or understandings contrary to the law are not permitted.

In particular, the selection of suppliers, consultants, collaborators, and agents is based on objective criteria such as quality, price, convenience, capability, and efficiency, with the aim of establishing relationships of trust.

In commercial relations, the Company strictly complies with applicable anti-money laundering and anti-usury regulations. It verifies the reliability of counterparties in advance to avoid involvement, even unknowingly, in unlawful transactions that may finance criminal or terrorist activities.

4.3 Relations with Public Administrations, Institutions and Public Officials

Relations between Robans and Public Administration, public bodies, supervisory authorities, and, in general, all institutional stakeholders, both domestic and foreign, are managed in compliance with the law and the principles of legality, fairness, integrity, and transparency. Robans condemns all forms of corruption, extortion, and conflicts of interest and adopts measures to prevent them.

In dealings with representatives, executives, officials, or employees of public institutions, it is prohibited to:

- establish personal relationships of favor or exert undue influence over decisions;
- offer employment opportunities, collaborations, or personal benefits;
- offer or promise money, goods, or other advantages, even indirectly, except for gifts of nominal value compliant with laws and customary practices, provided they are not aimed at obtaining favors;
- offer or accept goods, services, or favors to obtain preferential treatment;
- request or obtain confidential information beyond what is permitted by law.

Anyone who, in carrying out activities on behalf of the Company, receives improper requests or offers must promptly inform their superior and suspend any relationship with the parties involved until further instructions are provided.

4.4 Relations with political and Trade Union Organizations

Relations with political and trade union organizations are handled by duly authorized Company Representatives or by individuals delegated by them, in compliance with the provisions of this Code, the Company's Articles of Association, and applicable laws, with particular regard to the principles of impartiality and independence, both nationally and internationally.

In any case, any form of financing or contribution to political parties or their representatives is prohibited.

4.5 Competition

The Company recognizes the value of competition as a driver of economic development and operates in compliance with freedom of enterprise and equal market access, safeguarding customers and the quality of products and services. To prevent violations of competition rules, the Company defines its strategies and commercial policies independently and autonomously from competitors.

Any non-compliant behavior must be reported to the relevant managers. It is not allowed to make false or unfair statements that discredit competitors or their products and services.

4.6 Anti-Corruption

The Company, in line with its values of honesty and transparency, adopts measures to prevent and combat all forms of corruption, both public and private.

The Code of Ethics defines the principles of conduct to reduce the risk of violations of anti-corruption laws in the countries where the Company operates and to promote sustainable value based on professionalism, legality, fairness, and respect for individuals.

In the absence of specific legal provisions, Recipients and third parties must refer to the principles and guidelines set out in this Code.

4.7 Relations with Supervisory Authorities

The Company ensures maximum cooperation with supervisory authorities, providing the requested information and guaranteeing, during inspections or audits, the availability of its personnel, guided access to facilities, and access to documentation.

Following any observations made by supervisory bodies, Robans will promptly take action to address them and/or align its activities with the received indications.

In complex cases, the Company considers such observations as opportunities for improvement and agrees with the authority on the main actions to be undertaken, establishing a relationship based on collaboration and mutual trust.

To ensure these objectives, the Company guarantees proper accounting records in compliance with legal and statutory provisions and adheres to the principles of accuracy and fairness in the preparation of any legally relevant document reflecting economic, financial, and asset-related information.

5. Human Resources

5.1 Recruitment, Development and Professional Training

The Company selects and manages personnel based on merit, competence, and individual capabilities, and promotes professional development through training and upskilling activities. Recipients are required to participate diligently in such activities and to report any training needs.

In carrying out their activities, each Recipient must act with care and in compliance with safety regulations, in order to protect themselves and their colleagues, adhering to the instructions provided regarding workplace health and safety.

Any form of harassment, intimidation, or abuse of authority is prohibited, including psychological, physical, or sexual conduct, as well as mobbing.

It is also prohibited to promise or offer financial advantages, benefits, or career advancement in exchange for conduct that violates the law, this Code of Ethics, or internal rules.

Any form of retaliation against those who refuse, report, or disclose improper conduct is strictly prohibited.

Robans strictly rejects the use of child labor, any form of forced or compulsory labor, modern slavery, and human trafficking, and is committed to monitoring its supply chain to prevent such practices.

The Company promotes policies aimed at supporting work-life balance, recognizing that employee well-being also depends on an appropriate balance between professional and personal life.

5.2 Use of Alcohol and Drugs

The Company promotes a safe, healthy, and productive working environment and requires all Recipients to refrain from consuming alcohol or drugs while performing their work duties, at the workplace, or during company events.

It is prohibited to report to work under the influence of alcohol, drugs, or other substances that may impair the ability to perform duties safely, affect work performance, or endanger one's own safety or that of others.

Recipients are also required to report any situations in which the use of alcohol or substances by colleagues may pose a risk to health, safety, or the proper functioning of company activities, without fear of retaliation.

Failure to comply with these provisions constitutes a violation of the Code of Ethics and may result in disciplinary measures, including, in the most serious cases, termination of employment, in accordance with applicable laws and collective agreements.

5.3 Diversity, Equity and Inclusion (DEI)

The Company values diversity as a source of enrichment and innovation and is committed to creating an inclusive, fair, and respectful work environment.

Robans actively promotes equal opportunities for access, growth, and professional development regardless of gender, age, ethnicity, nationality, sexual orientation, gender identity, religion, disability, or personal conditions. Particular attention is given to gender balance in leadership roles, inclusion of persons with disabilities through accessibility and appropriate conditions, work-life balance policies, and the use of inclusive language in all communications.

The Company ensures equal pay for equal work, skills, and experience, and prohibits discriminatory practices in recruitment, hiring, training, compensation, and promotion, as well as offensive language, exclusion of colleagues, and stereotypes in professional evaluations.

The Company monitors annually the composition of its workforce by gender, age, and nationality, the gender pay gap, access to leadership positions, and the effectiveness of inclusion policies, communicating DEI objectives through its sustainability report.

6. Conflict of Interest

The Company operates to prevent situations of conflict of interest, including potential ones.

Recipients must act in the interest of the Company and pursue its objectives in the performance of their activities.

Any situations of conflict of interest must be promptly and fully disclosed in accordance with company procedures.

The applicable legal provisions on conflicts of interest for members of administrative and control bodies remain unaffected.

7. Accounting and Internal Controls

7.1 Traceability of Activities

Each Recipient must retain adequate documentation for every transaction carried out, in order to allow, at any time, verification of the reasons, methods, and phases of the transaction.

7.2 Transparency and Completeness of Information

Information disclosed by the Company is complete, accurate, transparent, and understandable, enabling third parties to make informed decisions in their relations with the Company.

The Company complies with all tax laws and regulations, continuously updates its obligations, and manages processes with rigor and transparency to prevent violations in tax matters.

7.3 Corporate Communications and Accounting Records

The Company considers accounting transparency and the maintenance of accurate, complete, and lawful records to be fundamental for effective control.

Each transaction must be supported by adequate documentation allowing for its accounting recording, reconstruction, and the identification of any responsibilities.

Financial statements must provide a true, clear, and complete representation of the Company's economic, financial, and asset position, as well as that of entities it controls or in which it holds interests.

The Company complies with all corporate, administrative, financial, and tax regulations and adopts tools to prevent conduct that may violate them.

7.4 Internal Controls

The proper functioning of a complex organization requires controls at all levels. The Company adopts an internal control system to verify and guide its organization.

Each Recipient is responsible, within the scope of their duties, for the proper definition and functioning of these controls.

8. Corporate Policies

8.1 Environmental Protection

The Company is committed to protecting the environment by aligning its choices with the need to balance economic activity and sustainability, in compliance with the law and in accordance with best practices and scientific research.

Protecting the environment means monitoring the impact of processes and products throughout their lifecycle, using natural resources efficiently, continuously assessing and improving environmental performance, and engaging employees by raising awareness on environmental issues.

The Company interprets Corporate Social Responsibility by integrating three essential aspects: environmental sustainability, through the reduction of impacts and protection of resources; social sustainability, through the protection of safety and community expectations; and economic sustainability, by investing in growth and business continuity, ensuring long-term stability for employees, shareholders, and stakeholders.

8.2 Protection of Health and Safety in the Workplace

The Company recognizes that the knowledge, skills, and professionalism of its personnel are essential to achieving corporate objectives and is committed to ensuring a safe and healthy working environment.

Protecting workers' health and safety means providing the necessary resources to continuously improve machinery and production processes, enhance employee awareness and skills, monitor safety performance, eliminate or reduce risks, and involve workers in decision-making and in monitoring health and safety conditions.

Each Recipient is responsible toward their collaborators for exercising the utmost care in risk prevention. The design of workplaces, equipment, and processes must comply with applicable safety and hygiene regulations, and each Recipient must strictly adhere to all safety measures to protect themselves and others.

In particular, it is prohibited to carry out work activities under the influence of alcohol or drugs, in line with Section 5.2 of this Code. Failure to comply constitutes a violation of the Code of Ethics and may result in disciplinary measures, including termination of employment in the most serious cases.

8.3 Protection of Intellectual and Industrial Property

The Company protects its intellectual property, including patents, trade secrets, trademarks, know-how, and developed expertise, in order to maintain its competitive advantage.

Anyone acting on behalf of the Company must protect and properly manage such information, safeguarding documents, data, designs, software, methods, and techniques in accordance with internal procedures. The same protection applies to the intellectual property rights of customers and third parties.

9. Information and Confidentiality

9.1 Confidential and Inside Information

Recipients who possess confidential or inside information must keep it confidential and share it only for work-related purposes, ensuring that recipients are bound by confidentiality obligations.

Official communication regarding the Company's activities is reserved exclusively to formally authorized functions.

Recipients must not use non-public information for personal or corporate purposes, nor disseminate false or misleading information that could deceive third parties or influence the market.

The obligation of confidentiality remains in force even after termination of the relationship with the Company, in accordance with the law.

9.2 Protection of Personal Data

In the course of its activities, the Company processes personal data relating to Recipients and third parties, and they must ensure that such data is handled in compliance with applicable laws.

Data processing is permitted only to authorized personnel and in accordance with internal procedures compliant with the relevant regulations.

9.3 Confidentiality

All information acquired by Recipients in the context of their employment or collaboration relationship is the property of the Company. This includes personal data relating to Recipients and third parties, meaning any information that allows the direct or indirect identification of natural or legal persons, entities, or associations, as well as confidential information, namely Company data which, if disclosed without authorization, could cause harm to the Company or to entities it controls or in which it holds interests.

The Company guarantees the confidentiality of the information in its possession, in compliance with applicable laws, including data protection regulations, and requires Recipients to use such information exclusively for the performance of their professional duties.

9.4 Digital communication and use of Social Media

Recipients who use digital communication tools (email, social media, online platforms) in connection with their corporate role must maintain a professional, proper, and respectful conduct. They must not disclose confidential or sensitive Company information, express personal opinions attributable to the Company without authorization, or make statements that could harm the reputation of the Company, colleagues, customers, suppliers, or competitors.

They must also respect intellectual property rights and copyright and must not use corporate accounts for personal purposes.

Official Company communications through digital channels and social media are permitted exclusively to expressly authorized personnel.

Improper use of corporate digital tools or online conduct that damages the Company's reputation constitutes a violation of the Code and is subject to disciplinary measures.

It is prohibited to use Company IT systems to access, download, or distribute illegal, offensive, or inappropriate content, engage in cyberbullying or online harassment, breach IT security (of the Company or third parties), or install unauthorized software.

10. Implementation, Control and Dissemination Rules

10.1 Communication and Revision of the Code

The Company informs all Recipients about the Code of Ethics and promotes its observance, ensuring its dissemination, interpretation, clarification of provisions, monitoring of compliance, and updating as needed.

The principles contained in this Code of Ethics are implemented in practice through the operational rules set out in the Company Code of Conduct, which defines concrete behaviors and procedures to be followed in work activities and in relations with third parties. All Recipients are required to be familiar with and comply with the provisions of the Code of Conduct in the performance of their duties, in line with the general principles of this Code of Ethics.

Revisions to the Code are approved by the Board of Directors upon proposal of the Chairman, taking into account stakeholder observations and encouraging their contribution to identify any shortcomings.

10.2 Disciplinary System

The Company, through its competent bodies and functions, applies sanctions in a consistent, impartial, and proportionate manner in relation to violations of the Code of Ethics, in compliance with applicable laws and employment contracts.

Failure to comply with the rules of the Code may result in disciplinary measures, up to and including termination of the employment relationship, in accordance with applicable labor laws and national collective agreements.

Any violation of the Code of Ethics is promptly assessed by the Supervisory Body, within its remit, for the adoption of appropriate measures.

Suppliers, agents, customers, and all external parties operating with the Company are also required to comply with the Code. Violations will be considered a breach of contract, with all consequences provided for by law and contractual agreements, including possible termination of the relationship.

10.3 Reporting of Misconduct and Protection of the Whistleblower

The Company encourages the reporting, in good faith, of behaviors, acts, or omissions that may constitute violations of national or European Union laws, this Code of Ethics, organizational models, internal procedures, or the principles of fairness and transparency on which the Company is based.

To this end, the Company provides dedicated reporting channels designed to ensure the confidentiality of the identity of the whistleblower, the persons involved, and the content of the report, as well as the protection of personal data, in compliance with applicable whistleblowing regulations.

Any form of retaliation or discrimination against individuals who submit reports in good faith is strictly prohibited; retaliatory conduct will be subject to sanctions.

Reports that are manifestly unfounded and made with intent or gross negligence may result in the application of disciplinary measures, in accordance with the law.

10.4 Effective date

This Code of Ethics shall enter into force on 1 January 2026 and shall be binding on all employees, collaborators, suppliers, and third parties operating with the Company.

All provisions contained in the Code apply to ongoing relationships as of the effective date, without prejudice to rights already acquired under applicable law.

Any updates or revisions to the Code shall enter into force on the date established by the Company and shall be communicated to all Recipients.