

FASAC1955

CODE OF BUSINESS ETHICS

Rev. 02

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Cassina Rizzardi (CO), 14/05/2024

the Legal Representative

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1. GENERAL PRINCIPLES

The company FASAC S.p.A. (hereinafter "FASAC") conducts its business in an ethical manner, with moral integrity and fairness and pursues the purposes of its articles association in compliance with its corporate mission.

All persons related to FASAC, recipients of this Code, must manifest total moral integrity in the actions taken on behalf of FASAC; transparency and moral integrity being understood as:

- adherence to the institutional policies of FASAC established in the Code of Ethics;
- compliance with regional, state, European or other countries' legislation when operating there;
- transparent and direct communication with public bodies and with the various persons with whom FASAC operates;
- the taking responsibility for their actions.

1.1 NATURE OF THE CODE OF ETHICS

The Code of Ethics is addressed to all those who work for FASAC or who, in any case, are linked to FASAC, in order to make clear, unequivocal and understandable, the ethical principles adopted by FASAC.

The Code is indeed the official document in which the ethical principles of FASAC are reflected and established. All persons who interact with FASAC must subscribe to said principles.

Reasons and purposes for adopting the Code of Ethics:

- to set a standard of conduct that seeks to prevent the perpetration of crimes related to the activity of FASAC or in any case in the interest or for the benefit of FASAC;
- to identify appropriate internal control measures and tools for monitoring compliance with the Code;
- to create value.

1.2 OBJECTIVES OF THE CODE OF ETHICS

The needs analysed in the Code are not only of a legal and economic nature but are dictated by the strict social and moral commitments made by FASAC.

FASAC strives to set an example through its transparent and correct image and, therefore, has adopted a Code that respects and promotes the following principles and conduct:

- FASAC operates legally and ensures that all parties obliged to comply with the Code comply with the laws and other regulations in force preventing them from committing crimes and any other type of offence;
- FASAC seeks to avoid any conduct that may facilitate or even indirectly lead to a suspicion of the perpetration of any type of offence, undermine the trust of stakeholders or the

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transparency shown to them or that may simply disrupt the smooth running of the work environment;

- vis-à-vis institutions, FASAC aims to:
 - work within the established rules and make the nature of their purposes available and clear;
 - conduct its business with the utmost confidentiality;
 - reconcile its purposes with the needs of the community;
- vis-à-vis its stakeholders FASAC seeks to:
 - inform them on the operations in which FASAC is involved, which could influence their decisions;
 - prepare the financial statements and all mandatory documents in a clear, transparent, truthful and accurate manner;
 - conduct its business with due propriety, preventing its Directors from acting in a conflict of interest with FASAC and with all stakeholders;
 - maintain the confidentiality of the information received while respecting privacy.

1.3 RECIPIENTS OF THE CODE OF ETHICS

The Code of Ethics is addressed to those who are obliged to observe the principles contained therein and who are subject to penalties in the event of violation of its provisions: the shareholders, Directors, Statutory Auditors as well as any person exercising a management and control role in FASAC - regardless of their formal legal title.

All employees and subcontractors, even occasional, of FASAC are also mandatory recipients of the Code and subject to penalties for violation of its provisions.

Advisors, suppliers and partners of FASAC's commercial initiatives and anyone carrying out activities in the name and on behalf of or under the control of FASAC are also mandatory recipients of the Code.

2. PRINCIPLES AND CODE OF CONDUCT

2.1 HUMAN AND WORKERS' RIGHTS

The company undertakes to respect, protect and promote the legislation in force to protect human and workers' rights, and notably:

- **To refrain from any use of forced or compulsory labour.** No worker should be forced to work under threat of penalties, with the use of force or intimidation. Workers may voluntarily terminate their employment after reasonable notice, and are not required to make any deposits or hand over identity documents to the employer or any third party. Workers are free to leave the workplace at the end of their shift and are not required to pay fees or other costs for their initial hiring or for remaining in post. Workers are not forced to use the accommodation or transportation provided by the company.
- **To refrain from any use of child labour.** The company does not employ children under the age required by national laws for access to employment or that for compulsory schooling, and in any case under 15 years of age (or 14 years in the case of developing countries within the meaning of ILO Convention 138). If a child under the established minimum age is employed in the company, the company will take all appropriate measures to remove the child from the workplace and to ensure an adequate remedy, including active support for access to education.
- **To protect young workers.** Young workers (under the age of 18) are not employed during night hours or in conditions that compromise their health, safety or moral integrity and/or that harm their physical, mental, spiritual, moral or social development. Young workers do not work for more than 8 hours per day or for more than the applicable national legal limits for working time. Young workers do not work overtime and benefit from a minimum consecutive rest period of 12 hours, in addition to the usual weekly rest days. However, access to continuing education or additional educational opportunities, such as vocational or technical training, is permitted.
- **To refrain from practising and never tolerate discrimination, harassment and violence.** The company does not adopt, support or tolerate discrimination in employment, including with regard to recruitment, hiring, training opportunities, working conditions, job assignments, pay, benefits, promotions, discipline, dismissal or retirement on the basis of sex, gender identity, age, religion, marital status, parental status, race, caste, social background, illness, disability, pregnancy, ethnic and national origin, nationality, membership in workers' organizations including trade unions, political affiliation, sexual orientation or any other personal characteristic. The company promotes an environment free of harassment and violence, where all individuals are treated with respect and dignity, and encourages anonymous reporting of abuse or harsh treatment. The company will treat and investigate seriously all allegations of discrimination, violence and harassment, applying, where appropriate, disciplinary measures, up to the dismissal of the perpetrators of such actions. The disciplinary procedures adopted by the company are written down and communicated to all workers.
- **To achieve gender equality.** The company offers equal opportunities to all individuals, regardless of gender, gender identity and sexual orientation, for all aspects of training and professional and personal development. The company is committed to achieving gender

equality through fair, just and transparent recruitment, promotion and remuneration procedures and practices. The company protects pregnant women, mothers and their children, including their health and safety, workers with family responsibilities from discrimination, dismissal and any holding up of advancement in their careers.

- **To respect the right to freedom of association and collective bargaining.** The Company does not interfere with, hinder or impede the right of workers to join or form trade unions or associations of workers of their choice and to bargain collectively. The company undertakes to comply with collective bargaining agreements and to allow workers' representatives access to the workplace to perform their representative functions.
- **To ensure safe and healthy working conditions.** The company takes appropriate measures and implements systems to prevent accidents, injuries and illnesses associated with work activities or occurring during work, minimizing, as far as reasonably practicable, the causes of hazards inherent in the work environment. The company provides special protection in relation to health and safety to vulnerable categories of workers such as – but not limited to – young workers, mothers and expectant mothers and people with disabilities. The company provides adequate fire protection and ensures the strength, stability and safety of buildings and equipment, including residential facilities where provided.
- **To pay fair remuneration.** The wages and benefits that the company pays for regular working hours meet, as a minimum, national legal standards or industry benchmark standards, whichever is higher. In any case, wages should always be sufficient to meet basic needs and provide a discretionary income. The company pays a surcharge for overtime work.
- **To comply with working time regulations.** The company undertakes to ensure that working hours comply with national laws, collective bargaining agreements and industry benchmark standards, depending on which offers greater protection for workers. Workers are not required to work more than 8 hours per day or 48 hours per week on a regular basis (excluding overtime), and daily and weekly rest periods are guaranteed. Overtime is voluntary, must not exceed 12 hours per week and is not required on a regular basis.
- **To refrain from stipulating precarious employment contracts.** The company undertakes to enter into recognised and established employment relationships in accordance with national legislation and international labour standards. The company refrains from resorting to labour-only contracts, subcontracts, home-based work arrangements, apprenticeship programmes where there is no real intent to impart skills or provide regular work, excessive use of seasonal or fixed-term employment contracts, in order to evade obligations to employees under labour or social security laws and regulations arising from a regular employment relationship.
- **To ensure equal treatment of immigrant workers.** The company refrains from discriminating against immigrant workers compared to local workers. The company does not deprive immigrant workers of their travel documents and provides them with an employment contract written in a language understandable to the worker with clear information on the terms and conditions of their employment. In the event that the company provides such workers with food, lodging, transportation or other services, these must be provided at a rate not exceeding the market rate.
- **To ensure equal treatment of home-based workers.** The company refrains from discriminating against workers at home compared to those who work at the company plant. The company undertakes to offer home workers the same protections and the same conditions as reserved for those who work at the company plant.
- **To protect minorities.** The company is committed to respecting the human rights of individuals belonging to specific groups or populations at risk and who are particularly vulnerable and in

relation to whom special protection is due, including indigenous populations, women, national or ethnic, religious and linguistic minorities, children, persons with disabilities and migrant workers and their families.

The company requires all staff to facilitate the respect of human rights by refraining from engaging in behaviour that is contrary to the Company Policy and by monitoring abuses that may occur in the company, immediately ensuring the cessation of any behaviour contrary to human rights and adopting all necessary precautionary measures, within their sphere of competence, to prevent risks to the health and safety of themselves and other people as well as accidents in the company.

2.2 ENVIRONMENTAL PROTECTION (ENVIRONMENTAL AND CHEMICALS POLICY)

The company undertakes to comply with the legislation in force to protect the environment and to reduce its environmental impact, and in particular to:

- **Monitor and reduce energy and water consumption.** The company is committed to collecting data on energy and water consumption and to setting and achieving consumption reduction targets. It also undertakes, where possible, to increase the use of renewable energy sources.
- **Properly monitor and dispose of wastewater.** The company undertakes to collect data on the amount of wastewater possibly produced through its activities and to ensure that such wastewater is adequately treated before entering water courses, in order to meet the minimum requirements, set by national or local laws, or by the chosen standard, if these are more restrictive.
- **Monitor gas emissions into the atmosphere.** The company undertakes to identify the sources of greenhouse gas emissions into the atmosphere and collect data on the emissions in order to monitor them. The company also undertakes to identify measures to reduce the emissions, as far as possible.
- **Properly monitor and dispose of solid waste.** The company undertakes to collect data on the amount of waste produced, to dispose of such waste in accordance with local and national regulations and to reduce the production of waste, favouring, where possible, reuse and recycling practices. The company ensures that it does not incinerate waste on site and does not dispose of waste in uncontrolled landfills.
- **Ensure responsible management of chemicals used in the processing of certified products.** In the event that the company uses chemical inputs for its processing of certified products, it undertakes to collect and store information on the management and safe use of such inputs so as not to cause harm to the people who use them and the environment.

The company requires all staff to assist in protecting the environment, ensuring that their activities have the least possible impact on it by as far as possible, using resources responsibly and paying great care and attention to consumption and the handling of chemical products and to their safe use and to avoiding their discharging into the environment.

2.3 CONSUMER AND CUSTOMER PROTECTION

The company undertakes to act in accordance with correct commercial, marketing and advertising practices towards its customers and consumers, taking reasonable measures to ensure the quality and reliability of the products and/or services offered. In particular, the company undertakes to ensure that the products and/or services offered meet the legal requirements and those of the voluntary standards it has signed. It also undertakes to provide accurate, verifiable and clear information on the products and/or services offered.

The company requires all staff to collaborate in the creation of products and/or services that are in line with customer expectations and comply with the relevant legislation, reporting any anomalies and refraining from giving deceptive or misleading information.

2.4 PROHIBITION OF BRIBERY AND CORRUPTION

The company, in its business relationships, refrains from illegal or collusive practices and behaviour, does not make illicit payments, and does not promote attempts at corruption and favouritism. Such conduct causes damage to the community by interfering both with the rules of fair competition and the reasons that should form the basis for decisions, thus compromising the success of company activities and causing negative impacts both on the market and on the community as a whole. Moreover, such conduct could result in criminal penalties for both the company and the staff responsible for such conduct.

The company strictly prohibits all staff from bribery in the course of their work and from offering, promising, paying, claiming or receiving bribes or other undue benefits for themselves or others, either directly or indirectly, as a reward for improper actions. In addition, no bribery or facilitation payments are permitted to public officials for the purpose of expediting routine administrative matters.

2.5 RESPONSIBLE PROCUREMENT PRACTICES

The company is committed to preventing any contribution to negative impacts through its own procurement practices and to promoting a supply chain that is mindful and respectful of human and workers' rights and respectful of the environment. It undertakes, as far as possible, to establish stable contracts and fair supply conditions with its suppliers.

The company requires its staff, engaged in the selection and management of suppliers and supplies and in placing orders for raw materials and finished products, to comply with the supply conditions stipulated in the contract.

2.6 TRANSPARENCY OF ACCOUNTING RECORDS

The company undertakes to maintain adequate accounting and correct financial reporting, in line with current legal provisions and in order to ensure the transparency and fairness necessary to instill confidence in its business.

To achieve this goal, the company asks all involved staff to cooperate actively to establish and maintain the reliability of the company and its operations, maintaining accurate, timely, complete, correct and understandable accounting records, drawn up with diligence and honesty. The recording of false or misleading information and data is strictly prohibited. All payments must be supported by an invoice and a contract or order containing sufficient details to reflect the services that have been performed and must be recorded accurately and promptly.

2.7 CONFIDENTIALITY OF PERSONAL INFORMATION

The company ensures the confidentiality of all the information in its possession and compliance with the legislation on the management of personal data, in order to avoid the communication or dissemination of personal data in the absence of the consent of the data subject.

The company invites all staff to treat with absolute confidentiality the data, news and confidential information of which they become aware in the course of their work.

2.8 REPORTING OF VIOLATIONS (WHISTLE-BLOWING)

The Company has established a system for reporting violations of this document, which is anonymous, non-discriminatory and easily accessible. The company undertakes to take appropriate measures to protect persons who submit reports from retaliation, discrimination or penalties and to treat any information received regarding violations of this document with the utmost seriousness and to take the necessary actions.

In particular, reports must be sent through the following internal reporting channels:

- Certified email addressed to the Chair of the Supervisory Board of FASAC S.p.A.: Fasac.Whistleblowing@legalmail.it
- Ordinary or registered mail addressed to the Chair of the Supervisory Board of FASAC S.p.A. at the following address: FASAC S.p.A., via Manzoni 222 - 22070 Cassina Rizzardi (CO)
- Suggestions and complaints box at the plant
- through the portal dedicated to the address <https://fasac.wallbreakers.it/#/>
- at the request of the reporting person, to be sent through the aforementioned email channel, through a direct meeting with the Chair of the Supervisory Board of FASAC S.P.A.

The aforementioned channels have been established with a view to ensuring the protection of the confidentiality of the reporting party, the facilitator, the persons involved and in any case mentioned in the report, as well as the content of the same and the related documentation.

The identity of the reporting person and any other information from which their identity may be inferred, directly or indirectly, will not be disclosed to persons other than those competent to receive or follow up reports without the express consent of the whistle-blower (Article 12 Legislative Decree 24/2023).

If the internal report has been submitted to a person other than the Chair of the Company's Supervisory Body, using other reporting channels or tools not indicated in this procedure, the report must be forwarded to the competent parties within seven days of receipt, simultaneously informing the whistle-blower. It is specified that the report may in any case be submitted to the hierarchical superior but, in this case, it may not be considered a report made in compliance with this procedure and, therefore, the whistle-blower may not benefit from the protection provided by Legislative Decree 24/2023.

2.9 PENALTY SYSTEM

Conduct that violate the principles established in the Code of Conduct will be subject to disciplinary penalties pursuant to current legislation and/or the employment contract, regardless of any legal action against the perpetrator of the conduct.

3. POLICY ON THE RESPONSIBLE CONDUCT OF BUSINESS

The commitments described herein are implemented through a due diligence process that the Company undertakes to use in order to identify, prevent, mitigate, and account for the actual and potential negative impacts on human rights, workers' rights, the environment, and ethical business conduct that may derive from its operations, supply chain, and other business relationships.

Due diligence is a preventive, dynamic, risk-based process informed by meaningful stakeholder engagement, appropriate to the circumstances, involving multiple processes and objectives, ensuring continuous communication and may involve risk-based prioritization, and should not result in any exemption from liability.

The company undertakes to:

- exercise due diligence in decision-making processes concerning matters pertaining to the criteria of the undersigned standard, following the six following steps:
 1. Integration of the due diligence process into its policies and management systems;
 2. Identification of the negative impacts, actual or potential, associated with its activities, through risk assessment;
 3. Development of strategies to end, prevent or mitigate negative impacts;
 4. Monitoring the implementation of due diligence and its results;
 5. Communication of information on how the impacts have been addressed;
 6. Adoption of any actions to remedy the damage;
- exercise due diligence on the most significant risks related to the Organization's activities and supply chain, defining priorities for action based on the likelihood of the risk and the severity of the potential damage and consulting with potentially affected stakeholders. The company requires the same commitment to due diligence on the most significant risks also from its commercial partners, including suppliers, licensees, purchasing agents, logistics service providers and other intermediaries. The company also requires suppliers to request their own suppliers to exercise the same due diligence.
- meaningfully involve internal and external stakeholders in the due diligence process. This means timely, bona fide, two-way responsive communication;
- hear and address all complaints, submitted through legitimate processes, regarding the activities carried out by the company or any damage caused by the company or its supply chain;
- The company undertakes to review and possibly update the Responsible Conduct Policy periodically and, in any case, on any occasion when deemed necessary.