

Code of Ethics 231

(Code of Ethics for compliance with the provisions of Legislative Decree 231/01 as subsequently amended)

Edition	Description
1/2008	Document release
1/2010	<ul style="list-style-type: none"> Copyright and intellectual property protection Child pornography website block
1/2016	<ul style="list-style-type: none"> Harassment, bullying and discrimination
1/2018	<ul style="list-style-type: none"> Reference to the GDPR and revised edition of document
2/2018	<ul style="list-style-type: none"> Reference to Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 harmonising Regulation (EU) 2016/679 on the Protection of Personal Data
1/2019	<ul style="list-style-type: none"> Freedom of association and collective bargaining
1/2020	<ul style="list-style-type: none"> Environmental issues
1/2021	<ul style="list-style-type: none"> Safety at work
1/2022	<ul style="list-style-type: none"> Child labour
1/2024	<ul style="list-style-type: none"> Contributions and donations to third parties

MISSION

LANZI S.r.l. (hereinafter “LANZI” or “the company”)

- designs, manufactures and markets personal protective equipment, work clothing and accident prevention material;
- designs and manufactures automated systems for the storage, distribution, collection and management of accident prevention materials, auxiliary production equipment, components and spare parts;
- supplies accident prevention material regeneration and monitoring services.

Workplace accident prevention, worker protection and comfort have been the company's mission since its foundation in 1978.

The need to ensure conforming products and services to a wide range of customers, including multinational corporations and complex requirements, has led the company to adopt a development model based on a systemic view of production processes and the control of the entire production and supply chain: from product design to raw material selection, manufacturing, use and maintenance in the field, disposal at end of life.

Risk analysis continues to be the cornerstone of the technical process. To this end, LANZI avails itself of an exclusive Technological Laboratory, whose activities are supported by accredited European Laboratories, with the aim to assess the performance and simulate the application conditions of its products, while developing new solutions and guaranteeing full compliance with the specifications.

Furthermore, ergonomic considerations, the use of safe materials and the eco-compatibility of production cycles are increasingly viewed as the ultimate goal of the process.

Even in “Best Cost” countries, the selection and qualification of Suppliers/Partners – who are required to operate in keeping with international standard SA 8000 – takes into account the logic of Company Social Responsibility, whose principles affect the company as a whole.

PURPOSE, FUNCTION AND SCOPE OF THE CODE OF ETHICS

With a view to defining with clarity and transparency the set of principles and values it draws inspiration from to attain its objectives, LANZI has prepared this Code of Ethics (hereinafter also the “Code”), adherence to which is essential for the company’s flawless operation and its reputation and image.

The Code is a document approved by the Board of Directors that sets out the principles and the fundamental rules of conduct LANZI intends to adhere to, in doing business and in its dealings with all those who operate and have relations with the company.

Through the adoption of the most appropriate prevention and control measures, the company has always been committed to strict compliance with the laws and regulations in force, at all decision-making and operational levels, pursuant to the provisions set out in Legislative Decree 231/01 and, more generally, with the principles of ethics, integrity and transparency on which LANZI's reputation is based.

RECIPIENTS AND DISSEMINATION OF THE CODE

In terms of objective and subjective scope and detailed provisions, the “Charter of Values” provided for by this Code is different and broader than the Organisation, Management and Control Model (as per Legislative Decree 231/01). Accordingly, the recipients of this Code of Ethics shall be considered to include:

- LANZI directors, managers and employees, as well as all those who, in various and different capacities, have a legal relationship of sub-contracted employment with the company that effectively and structurally makes them part of the company organisation;
- agents, company representatives, collaborators (not effectively and structurally included in the company organisation), self-employed workers, intermediaries, distributors, customers, suppliers, and, more generally, LANZI's contractual counterparties; parties that are expected to share and rigorously comply with the principles and rules of conduct advocated by the company, regardless of their mandatory subjection to a system of management and supervision and, hence, of derivative or indirect responsibility.

Any infringement of the rules of this Code of Ethics undermines the relationship of trust established with the company.

Adherence to this Code by employees and collaborators and their commitment to comply with the overall duties of loyalty, fairness and performance of their employment contract in good faith are to be considered an essential part of their contractual obligations also based on, and to the intents and purposes of, Article 2104 of the Italian Civil Code.

Any infringement of the individual rules of conduct set out in this Code of Ethics by company employees shall be considered a breach of discipline and shall be dealt with pursuant to the applicable National Collective Labour Agreement (CCNL).

Compliance by third parties (suppliers, consultants, etc.) with the Supplier Code of Conduct, derived from the LANZI Code of Ethics, includes the obligation to fulfil the duties of diligence and good faith in the negotiation and execution of contracts entered into with the company. Therefore, the Code of Conduct is considered an integral part of the contract with the aforementioned parties, which may be terminated if the company becomes aware – to the extent feasible as a function of the nature and terms of each relationship – of non-compliant behaviour.

With regard to this Code, LANZI:

- ensures its timely dissemination in-house and to all its intended recipients;
- provides appropriate supporting information;
- requires all recipients to comply with it;
- expects recipients to report any deficiencies thereof, and actively contribute to its implementation;
- ensures that all updates and changes are published and, in any case, made known to the recipients.

GUIDING PRINCIPLES

LANZI's Code of Ethics is based on and adopts the following principles:

- **Legality**
company growth and development while complying with all applicable laws and regulations
- **Transparency**
commitment to informing internal and external stakeholders with transparency about the company's organizational and financial situation
- **Honesty and integrity**
commitment to ensuring that relations with third parties are characterised by honesty, fairness, impartiality and professionalism. Reputation based on upstanding, consistent and ethically irreproachable behaviour
- **Diligence**
investing in research and development on an ongoing basis, and full compliance with international regulations to ensure product and service conformity to the safety and reliability standards envisaged
- **Fairness in dealing with the market and competitors**
upholding the value of fair competition and abstaining from behaviours violating competition, copyright and intellectual property regulations
- **Prevention of conflicts of interest**
business decisions and choices made in the best interests of the company

- **Safety and protection of the individual**
promoting the physical and moral integrity of employees by investing in the protection of workers' health and safety in the workplace; disseminating the culture of safety, also through the active engagement of workers and their representatives.
Employee relations characterised by loyalty, fairness and respect irrespective of level of responsibility, without prejudice to the different roles and functions within the company
- **Inclusion and equal opportunities**
valorising the presence of people with different cultures, prospects and experiences for a mutual acquisition and exchange of new skills and contributions
- **Protection of personal data**
adopting procedures designed to ensure the confidentiality of the information collected and, in any event, compliance with personal data protection regulations, with a special focus on Legislative Decree 196/2003 as amended by Legislative Decree harmonising Regulation (EU) 2016/679 on the Protection of Personal Data
- **Protection of the environment**
complying with and promoting the principles of environment responsibility, the precautionary principle, the management of environmental risks.

RULES OF BEHAVIOUR AND BUSINESS CONDUCT POLICIES

LANZI makes sure that its resources are exclusively allocated to the pursuit of its corporate goals; the company does not finance or otherwise support, whether directly or indirectly, other companies, profit-making entities, political parties or trade unions, except, in the latter case, for the contributory cooperation provided for by law, while relations with mass media are exclusively entrusted to the departments and persons appointed to that end.

LANZI organises and develops its business activities by requiring the recipients of this Code to adapt their behaviour to the principles of business conduct expressed herein.

It is up to everyone to give concrete expression to the values and principles set out in the Code, to strengthen trust, cohesion and team spirit.

a) GENERAL RULES OF BEHAVIOUR

Without prejudice to the obligation to observe applicable laws and regulations, the company collaborates actively and concretely with the authorities and the same behaviour is required of every recipient of this Code in the performance of their duties.

All activities carried out within the company must be performed with professional and ethical commitment. Each person is expected to make professional contributions commensurate with their responsibilities within the company and to act in such a way as to protect the company image.

LANZI takes action to ensure that employee selection, induction, training and professional growth are in keeping with its business needs. Work is organized according to health and safety principles pursuant to the provisions set out in Legislative Decree 81/2008 as subsequently amended.

The recipients of the Code shall act so as to prevent any possible conflict of interest, also with regard to any possible involvement of personal or family interests that might interfere with the institutional benefits of their actions and/or the impartiality of their decisions.

The company takes appropriate security measures to minimise, in keeping with technical progress, the risks of loss of data for which it is the Data Controller, unauthorised access or unauthorised processing. All recipients, in the exercise of their tasks and within the scope of their responsibilities, are responsible for the implementation of said security measures, both with regard to IT tools and with regard to archives and paper records.

LANZI undertakes to attain the highest levels of integrity, honesty and fairness in all relationships, both internally and externally, thus abstaining from all forms of unlawful and improper payment.

The Company takes all mandatory and reasonably appropriate precautions to prevent money laundering and the generation of financial assets originating from illegal activities. In the exercise of their functions and within the scope of their duties, all recipients of the Code are responsible for the implementation and application of such precautions.

LANZI takes action to ensure the preservation and protection of the environment by pursuing the continuous improvement of its environmental performance. It also undertakes to operate in an environmentally friendly manner, assessing the impacts of the products/services offered and minimising the risks associated with the activities performed.

b) RELATIONS WITH EMPLOYEES

LANZI operates in accordance with the UN Universal Declaration of Human Rights. It is committed to creating and maintaining working conditions that safeguard the physical and psychological integrity of its employees. To this end, LANZI:

- adopts mechanisms to combat child pornography and, more generally, to protect children; it does not employ minors, in any capacity and under any contractual form (apprenticeship, traineeship, etc.)
- is committed to avoiding any discrimination on the basis of age, gender, sexuality, health status, race, nationality, political opinions and religious beliefs; it is committed to respecting people's rights, protecting their moral integrity and guaranteeing equal opportunities
- ensures remuneration conditions consistent with contractual terms and the level of responsibility within the organisation
- promotes working methods geared to achieving organisational wellbeing by fostering a work pace consistent with each employee's personal and family needs
- guarantees its employees freedom of opinion and expression as well as the right to form associations and join organisations of their choice without prior authorisation
- prevents and sanctions any form of intimidation, mobbing or stalking and any insulting or defamatory interpersonal attitudes in any way detrimental to the dignity and wellbeing of individuals in the workplace
- does not tolerate any form of irregular work, or exploitation of labour, that is to say, it does not allow any relationship that is not duly regularised as well as any type of utilisation of labour that is not covered by a contractual and regulatory framework consistent with the legal requirements in force in the country of reference.

LANZI undertakes to take care of its employees by promoting their personal and professional development, with initiatives designed to enhance their skills and expertise. All employees are guaranteed equal opportunities in terms of training and professional growth, on the basis of merit criteria and the results achieved. Personnel selection is carried out on the basis of professionalism and skills, in keeping with company needs, and by guaranteeing equal opportunities, while avoiding any form of discrimination or favouritism.

LANZI seeks the satisfaction of its staff by supporting initiatives aimed at achieving a working environment that is driven by motivation and engagement, promotes the acquisition of new skills and is capable of measuring, acknowledging and rewarding the contribution of each individual and team.

LANZI is committed to disseminating and enhancing a culture of safety, by developing risk awareness, promoting responsible behaviour on the part of all employees, and working to preserve personnel health and safety, especially through preventive measures.

Company activities are carried out in full compliance with accident prevention and safety regulations; operational management follows advanced criteria of environmental protection and energy efficiency, while pursuing the improvement of health and safety conditions in the workplace.

c) CUSTOMER RELATIONS

Relations with customers are geared to the full satisfaction of customer needs with the aim of establishing solid relationships inspired by the values of fairness, honesty, efficiency and professionalism.

Communications to customers and the documentation transmitted to them are based on criteria of clarity and completeness, avoiding the use of misleading or incorrect information.

The company abstains from giving or promising its customers gifts, presents or any other benefits that depart from normal practices, exceed a modest value or may in any way influence their actions.

In dealing with customers, the company shall always:

- operate within the framework of applicable laws and regulations;
- honour its commitments and obligations;
- supply accurate, complete and truthful information to enable the customer to make an informed decision;
- abstain from arbitrary discrimination in negotiations and from unduly exploiting any bargaining power it may have to the detriment of any customer;
- apply internal procedure in order to develop and maintain strong and long-lasting relationships with its customers.

d) SUPPLIER RELATIONS

Supplier selection and all purchases, of any type, are determined and made exclusively on the basis of objective evaluations of quality, price, delivery and service modalities most appropriate to company needs. In the belief that suppliers play a key role in improving its competitiveness, LANZI aims to establish and maintain stable, transparent and cooperative supplier relationships.

Company employees and collaborators do not accept gifts, presents or any other benefits that depart from normal practices, exceed a modest value or may in any way influence their actions.

In particular, interested parties shall not accept compensation, gifts or favourable terms whose economic value is more than symbolic, and in no case may they accept gifts that entail an obligation, even if only a moral one, to repay the giver through the conclusion of a contract with the company. Gifts include money and tangible items, as well as services and discounts on purchases of goods and services.

If gifts of substantial value are received, company employees and collaborators are required to inform their manager or their supervisor.

By the same logic, Model recipients cannot offer gifts, propose employment opportunities or favourable conditions going beyond normal relations of courtesy with a view to obtaining benefits of a personal nature, even if this may turn out to be in the interests of the company.

Accepting or giving monetary gifts is prohibited under any circumstances.

The company:

- adopts specific procedures to ensure that commercially and professionally reliable suppliers are selected and certified, paying special attention to parties operating and residing outside the European Community;
- excludes formal or informal alliances and contractual relationships with partners who commit human rights violations;
- evaluates its strategic suppliers also on the basis of their ability to operate and manufacture according to the principles of sustainability and environmental protection.

e) RELATIONS WITH PUBLIC OFFICIALS OR PERSONS IN CHARGE OF A PUBLIC SERVICE

Dealing with representatives of the Public Administration and public institutions is reserved exclusively for functions appointed and duly authorised to this end within the company and is strictly tied to the performance of their tasks. For this reason, documentation relating to contacts with Public Administration must be collected and stored.

Relations with public authorities are characterised by principles of transparency and active cooperation. It is therefore prohibited to promise or offer to public officials, persons in charge of a public service or employees of the Public Administration or other public institutions –through one's employees or representatives, or through third parties – money, goods, services or compensation, in any form whatsoever, or other benefits of any kind, or to exert undue pressure in order to unduly promote and favour one's own interests or to influence the decisions of public officials.

Offering gifts to representatives of public entities is prohibited.

The company abstains from any conduct aimed at or in any case instrumental to fraudulent and undue obtainment of contributions, financing, subsidies or other contributions from public institutions and entities, and, if any of the foregoing is duly obtained, ensures its correct and timely use.

In carrying out its activities, the company operates in a lawful and correct manner, cooperating with representatives of the judicial authority, the police force and any public entity or official having powers of inspection.

f) TRANSPARENCY IN ACCOUNTING AND CONTROL

In strict compliance with the laws and regulations currently in force, LANZI continuously updates its administrative-accounting system so as to ensure that it always provides a reliable and correct representation of the company's financial position, activities, and profitability, as well as the tools to identify, prevent and manage, to the extent feasible, financial and operational risks, also with regard to the use of public funding and tax management.

The accounting records and the documents arising from them are based on accurate, exhaustive and verifiable information; moreover, planning and control models are adopted that are consistent with and appropriate to the company's accounting methods.

All recipients of the Code are required to operate so as to ensure that relevant business events are correctly and promptly reported so that the company's administrative-accounting system can achieve the purposes described above and that the persons in charge of its control can operate in full compliance with the applicable regulations.

In conducting its business activities, the company ensures that choices and decisions are made on the basis of rigorous economic analyses and prudent risk assessments, so as to ensure the optimal use of its assets and resources.

The company recognises that the tax system should be based on relationships of trust and cooperation between citizens and the tax authorities, within a framework of transparency, balance and actual reciprocity. Accordingly, the management of financial resources must take place in compliance with the principles of transparency, legitimacy and traceability of operations.

The company condemns any action aimed at altering the accuracy and truthfulness of the data and the information set out in the financial statements, the reports or any other corporate communications provided for by law.

g) CONTRIBUTIONS AND DONATIONS TO THIRD PARTIES

LANZI makes no financial or in-kind contributions to politicians, political parties or lobbies.

LANZI makes donations to charities, medical research institutes, non-profit organisations and foundations operating in the community to support disadvantaged groups and promote health and culture. The names of the beneficiaries are published annually on the company website.

CONTROL AND REPORTING – THE SUPERVISORY BODY

Any breach of the rules set forth in this Code of Ethics must be reported, through the methods provided for by the whistleblowing procedure that, according to Legislative Decree 24/2023, governs the handling of reports concerning violations of the Organisational Model – of which this Code of Ethics is a part – and unlawful conduct as per Legislative Decree 231/2001.

Reports are received by a dedicated committee – staffed by Ms Monica VINAI and Mr Luca D’ANDREA – that handles them according to the whistleblowing procedure, which we refer to for detail indications on: i) the internal reporting system and transmission modalities, ii) the parties that can submit the reports, iii) the subject of the reports iv) the dedicated committee, v) how the reports should be handled, vi) the protection afforded to whistleblowers, reporters in bad faith and other persons mentioned in the provision, vii) the sanctions for those who violate the provisions of Legislative Decree 24/2023.

FINAL PROVISIONS

This Code of Ethics is subject to updates and possible amendments, which may arise from regulatory changes, operating experience, and possible changes to LANZI's organisation and/or activities.

Any change and/or addition to this Code shall be made according to the same modalities as those adopted for its approval.

Turin, February 2025