

CODE OF ETHICS

CROCCO S.p.A., in its daily commercial policies and practices, acts in respect of the principles and standards prescribed by legislation and operates in the fullest respect of the law and fundamental human values, such as the safeguarding of health, safety, and integrity, social responsibility, and respect for others. These values lie at the heart of CROCCO S.p.A. quality management.

The CROCCO S.p.A. Code of Ethics constitutes a set of standards for correct conduct applied to all CROCCO S.p.A. employees and executives. This Code has been prepared to provide employees and managers with guidance in the execution of their daily work activities.

This same elevated standard of professional conduct is also expected from all suppliers who work with CROCCO S.p.A. and all their employees.

The following principles must be respected by the employees of CROCCO S.p.A. and its suppliers:

Compliance with laws and regulations

Respect for the law is the fundamental principle of CROCCO S.p.A. policy. All CROCCO S.p.A. employees, managers, and suppliers are required to scrupulously respect all the laws and regulations applicable to them. Any real or presumed violation (and any attempt at violation) of the applicable laws and regulations must be immediately reported to CROCCO S.p.A. Management.

Honesty, equality, and fairness in relations with suppliers

Fair competition is the key to economic efficiency, the company's success, and the creation of value also where relationships between CROCCO S.p.A. and its suppliers are involved. In particular, fair competition is intended to mean:

- all suppliers are treated in the same way;
- all products and services must be regularly compared with those offered by competitors on the basis of clear and objective specifications;
- the scrupulous protection of the confidentiality of all conversations, information, and data;
- the selection of suppliers on the basis of objective criteria of quality, terms of delivery, health and safety, and commitment to the achievement of sustainable objectives.

All Suppliers must agree to accept this Code of Ethics and respect its guidelines.

To this end, CROCCO S.p.A. asks its suppliers to provide a signed statement of acceptance of this Code of Ethics and its guidelines.

Prevention of conflict of interest

CROCCO S.p.A. managers, employees, and suppliers must always act in the best

interests of the group. To this end, any situation that might create a conflict of interest (whether real or perceived) with CROCCO S.p.A. must be avoided. This applies particularly to:

- all the information and data provided by CROCCO S.p.A., which must be kept strictly confidential (unless they are public domain) and must not be used for personal gain or disclosed to persons not authorized to receive such information and data.

Prevention of corruption

Any and all forms of corruption and bribery, be they active or passive, are forbidden.

Forced labor

Any form of forced labor, including the withholding of wages or other forms of constraint, is forbidden.

Child labor

Any form of child labor is forbidden. Unless local laws specify higher ages, a CROCCO S.p.A employee must never be of school age or younger than 15 years old. Workers younger than 18 years of age are not allowed to perform dangerous activities or work at night.

Harassment

The dignity, privacy, and personal rights of each individual must be respected. Employees cannot be subjected to corporal punishment or physical, psychological, or verbal abuse.

Remuneration

Wages, including overtime and allowances, must correspond to the level specified by law and the regulations applicable in the nations in which CROCCO S.p.A. or its suppliers operate.

Working time

Employees may not be asked, except under exceptional circumstances, to regularly work more than the standard 48 hours a week (including overtime) except when national labor legislation indicates a different number of maximum working hours. Employees must be granted one day of rest after every seven consecutive days, except in the case of exceptional company circumstances.

Non-discrimination

All employees, regardless of color, race, nationality, social extraction, disability, sexual orientation, creed and political views, gender and age must be treated the same way in regard to their abilities and skills for every decision regarding their occupation, including



assignments, promotions, allowances, benefits, training, and dismissal and termination of contract. All the above also applies to persons not directly employed by CROCCO S.p.A.

Health, safety, and sustainability

While employees must be provided with a safe and healthful workplace in compliance with the provisions of the law, they are expected to contribute to the maintenance of the same through responsible action of their own. HSE policy applies to all CROCCO S.p.A. employees and managers and also to all sub-contractors and suppliers of goods and services. The respect of the principles therein is also expected of suppliers.

Environment

CROCCO S.p.A includes aspects of environmental protection in its strategy that determine the assumption of responsibility in all operations. CROCCO S.p.A. suppliers must respect all the applicable environmental protections standards and regulations in force.

Freedom of association and collective bargaining

CROCCO S.p.A agrees to respect the legal right of its employees to freedom of association and collective bargaining. CROCCO S.p.A. expects its suppliers to provide the same guarantee.

Safeguarding of CROCCO S.p.A. data

All information and data not considered public domain (such as strategic, financial, technical, legal, and commercial information and data), together with the personal data of CROCCO S.p.A. employees, clients, and/or suppliers, is considered CROCCO S.p.A. proprietary and/or reserved data.

CROCCO S.p.A. expects all its employees, managers, and suppliers having access to such proprietary and/or reserved data to use the same with all due care and to take every precaution necessary to prevent their alteration, disclosure, or inappropriate use.