

CODE OF ETHICS

FOR



ARTSANA  **GROUP**

INTRODUCTION THE CODE OF ETHICS

By adopting this Code of Ethics, Artsana S.p.A. and its subsidiaries (hereinafter jointly the "**Artsana Group**" or the "**Group**") express the commitments undertaken and objectives pursued both internally and externally in conducting their business and company activities, describing the principles underlying the spirit of the Artsana Group.

PURPOSE AND RECIPIENTS OF THE CODE OF ETHICS

The purpose of the Code of Ethics is to:

- promote an ethical approach to business;
- support the commitment to ensuring that it is managed in a sound and proper manner and that the integrity of the assets of the Artsana Group as well as of its reputation is safeguarded in the interests and for the benefit of all stakeholders;
- set out the rules of conduct that the Artsana Group organisation as a whole undertakes to follow in carrying out its activities and in relations with commercial partners, customers and suppliers, as well as the principles of behaviour which everyone is required to observe.

The **Recipients** of the Code of Ethics include, with no exception, the directors, statutory auditors, employees, agents, associates and all those who, directly or indirectly,

permanently or temporarily, operate on behalf of or in the interests of the Artsana Group, including suppliers, partners, customers and, in general, all third parties with whom the Group has relations (hereinafter, jointly, the “**Recipients**”), each one within the scope of their functions and responsibilities.

KEY PRINCIPLES AND VALUES

All relations and behaviours shall be based on the following key principles and values:

- **Legality, honesty and transparency**

Artsana Group regards compliance with the laws and regulations in force in the countries in which it operates as a fundamental principle. Any activity carried out by the Recipients shall be based on good faith, transparency and honesty, as well as on strict compliance with the regulations in force.

- **Equality and Impartiality**

Artsana Group cherishes and values every human resource, condemning all forms of discrimination in relation to age, gender, health condition, ethnicity, place of origin, religion, political and cultural opinions, social status or any other condition.

- **Personal Value and Integrity**

Artsana Group is committed to encouraging the professional growth of every individual, promoting equal opportunities and diversity as a positive and indispensable element for company development. It also condemns all forms of intimidation, harassment or abuse.

The Group is committed to protecting the physical and moral integrity of every individual, promoting a safe and healthy working environment and ensuring working conditions that respect individual dignity.

- **Fairness and Loyalty**

Relations shall be based on fairness, cooperation, loyalty and mutual respect.

- **Combating corruption and conflicts of interest**

In line with the key values of honesty and transparency that inspire the corporate spirit, Artsana Group is committed to implementing all necessary measures to prevent and avoid

corruption and situations that may conducive to conflicts of interest.

Therefore, acts that may directly or indirectly, even unintentionally, constitute corrupt conduct for the purpose of obtaining a personal benefit or a benefit for the company, such as, for example, accepting or paying sums of money are forbidden. This also applies to those countries where *facilitating payments* are considered lawful.

In the conduct of any company activity and in relations with third parties, any and all situations where the subjects involved are, or may even only appear to be, in conflict of interest, meaning the case in which a company representative pursues “personal” advantages or representatives of customers or suppliers or public institutions act, in their relationships with the Group, in a manner that violates the fiduciary duties of their position shall be avoided.

- **Reliability and Transparency**

All information provided, whether internally or to third parties, must be truthful and accurate, so that the Group can always ensure the utmost transparency in its relations with stakeholders.

- **Customer-centredness**

The Group is committed to pursuing standards of excellence with regard to consumers, also in view of the particularly sensitive target it caters to, which requires a high level of attention, diligence and quality of service.

- **Respect for the Environment**

Artsana Group undertakes to adopt measures to minimise the impact that its activities may have on soil, air, water, fauna and biodiversity, acknowledging the primary importance of respecting ecosystems and safeguarding the environment, also through the implementation of policies aimed at energy saving.

- **Fair Competition**

The Group believes it is essential, in order to foster growth and innovation, that the market should be as open, fair and transparent as possible: Artsana Group, therefore, pursues fairness and honesty in all its operations, and condemns any behaviour that may violate the principles of free and fair competition between companies.

- **Privacy**

The Artsana Group believes that it is essential to ensure the confidentiality of the information in its possession and guarantees compliance with regulations governing the protection of personal data.

- **Compliance with the Code of Ethics**

Compliance with the Code of Ethics shall be considered part of the contractual obligations of employees and of those who, for any reason, work in the interest or on behalf of the Group: the commitment of these persons to abide by the

rules of conduct set out in the Code of Ethics is an indispensable condition to establish and maintain any relationship.

In case of proven violations of the Code of Ethics, appropriate sanctions will be applied. The application of sanctioning measures does not depend on the establishment or on the outcome of legal proceedings against the person who committed the breach, and neither does it prejudice any further consequences, civil or otherwise, that may arise from the same conduct.

Recipients shall promptly report any know violation of this Code of Ethics according to the established procedures.

The Group undertakes that it will adopt appropriate instruments, procedures, regulations or instructions for specifically ensuring that the commitments and goals affirmed herein are reflected in the effective conduct of the Group and its employees and its outside workers.