

Ethics in business is an approach of paramount importance for the proper functioning and credibility of a company towards its customers and suppliers and, more generally, towards the entire economic context in which it operates. GRISTE Srl intends to transform the knowledge and appreciation of the ethical values to which it relates into a competitive advantage.

Griste Srl has adopted this Code of Ethics and Conduct (referred to here as the "Code of Ethics" or simply "Code"), which seeks to confirm and establish in a document the principles of propriety, integrity and transparency of behaviour, the way it operates and how it conducts relations, both internally and with third parties.

The "addressees" of the Code of Ethics are those who work for the Company: employees and administrators, as well as internal and external collaborators who contribute to achieving the Company's objectives. These subjects are therefore expected to know the content of the Code of Ethics and to contribute to its implementation and dissemination of its principles.

The rules contained in the Code of Ethics supplement the conduct that the Addressees are required to observe by virtue of current laws (civil and criminal) and regulations in force, and the obligations provided for in national labour agreements.

Addressees of the Code of Ethics who violate its rules damage the relationship of trust with the Company, thereby causing it harm, and will therefore be subject to the sanctions foreseen.

### **Relationship with employees and child labour**

Human resources are an indispensable factor for the existence, development and success of a company. This is why GRISTE Srl protects and promotes the value of human resources with the aim of improving and increasing the assets and skills of each employee, within the organisational context of the Company.

The Company offers equal opportunities to all employees on the basis of their professional qualifications and individual skills, without any discrimination on the basis of age, religion, ethnic or geographical origin, sexual orientation, politics or union membership. The Company, through the competent functions, therefore selects, hires, remunerates and manages human resources on the basis of criteria of merit and competence, in compliance with the collective bargaining agreement in force, and with the bonus system adopted and based on criteria of impartiality and fairness.

No individual under the age of 16 or the age for completion of compulsory education shall be employed by the company. No worker shall perform any task which, by its nature or circumstances, is likely to cause damage to health, safety or morals. No form of slavery or slavery-like practices (including sale, trafficking, debt bondage, serfdom or forced or compulsory labour) shall be permitted, irrespective of age.

### **Fair and non-discriminatory remuneration**

Employees' pay is awarded in accordance with the law and applicable collective bargaining, and therefore the pay given is sufficient to meet the basic needs of workers and their families.

GRISTE Srl operates in compliance with the laws and regulations governing wages and benefits, and employees and workers receive clear and transparent information on their wages, benefits, deductions, pay periods and fees.

Only statutory deductions are allowed, and deductions of any kind may not result in the worker receiving less than the minimum wage. Optional deductions can only be made with the express consent of the worker (free from undue influence, coercion or pressure).

Should the Company initiate disciplinary proceedings resulting in a reduction in salary, this must be documented and recorded.

### **Working hours**

Employees employed by GRISTE Srl work 40 hours per week on a regular basis.

The employees of GRISTE Srl are not obliged to work overtime, and any overtime is not imposed by the company but is agreed with the employees in accordance with their wishes.

Overtime is used responsibly and paid as per contractual provisions.



Overtime work is only carried out in exceptional circumstances in accordance with national legislation and with appropriate safeguards to protect the health and safety of workers.

### **Discrimination**

No person, whether an applicant, employee or worker, shall be subject to discrimination of any kind, whether direct or indirect, in connection with recruitment, salary, benefits, development, promotion, disciplinary procedures, dismissal or retirement on the basis of gender, race, religion, age, disability, sex, sexual orientation, nationality, political opinion or affiliation, trade union membership, belief, social group or origin, ethnicity or marital status.

### **Freedom of association and collective bargaining**

The right to freedom of association and collective bargaining is recognised and respected by GRISTE Srl. Workers are free to join trade unions and bargain collectively. No trade union (or similar) representatives are subject to discrimination and are granted free and unrestricted access to carry out their duties.

### **Harassment and abuse**

People working for or with GRISTE Srl shall be treated with respect and dignity and physical, sexual, psychological or verbal harassment or abuse, including threats of abuse, abnormal punishment, discipline or intimidation shall not be permitted. The Company is committed, through control policies, to ensuring a neutral working environment where no one feels threatened or intimidated.

### **Health, Safety and the Environment**

Workers shall be provided with a safe workplace to prevent and reduce the risk of accidents and injuries arising from or related to their work. Regulations and measures shall be adopted in accordance with best practice in occupational health and safety and prevailing industry guidelines and knowledge, taking into account specific hazards and risks in specific operations and activities.

Regular, recorded training is given to all individuals and repeated for new and reassigned workers. People must have access to clean toilets and water.

### **Discipline**

The Company believes that corporate conduct must always be pursued in formal and substantial compliance with the law. The free determination of the shareholders' meeting is protected, a transparent and reliable conduct is adopted, also towards creditors, the entirety of the share capital and of the non-distributable reserves is protected. The Company favours maximum cooperation with the Authorities in charge of controls and/or audits. In carrying out business activities or activities that have an effect, even indirect, on the same, the Recipients of this Code shall avoid any form of association that may be in any way connected to the committing of an offence.

### **Control**

In compliance with current regulations and with a view to planning and managing corporate affairs with a view to efficiency, fairness, transparency and quality, the Company shall adopt organisational and management measures suitable to preventing unlawful conduct or in any case conduct contrary to the rules of this Code by any person acting for each Company.

Cases of violation of this Code of Ethics may be reported by any recipient in confidence directly to the Board of Directors and the designated Supervisory Board.

### **Sanctions**

Violation of the provisions of this Code of Ethics shall constitute a disciplinary offence and breach of contractual obligations of the employment or service relationship or professional collaboration, with all consequent effects of law and contract, also pursuant to Articles 2104 and 2105 of the Italian Civil Code; it shall therefore entitle the Company to apply any disciplinary sanctions provided for by the National Collective Labour Agreement.