

INTRONA CERERIA S.R.L.

CODE OF ETHICS AND CONDUCT

APPROVED BY DETERMINATION
OF THE ADMINISTRATIVE BODY
OF 19-02-2024

Summary

FOREWORD.....	4
1.INTRODUCTION.....	5
2.RECIPIENTS.....	5
3.OUR VALUES.....	6
4.GENERAL PRINCIPLES.....	6
4.1.Responsibility.....	6
4.2.Respect for the person.....	6
4.3.Fairness (impartiality and solidarity).....	7
4.4.Honesty and fairness.....	7
4.5.Prevention of corruption.....	7
4.6.Tax compliance.....	7
4.7.Smuggling.....	8
4.8.Cultural heritage protection	8
4.9.Protection of individual personality	8
4.10.Effectiveness and efficiency.....	9
4.11.Transparency.....	9
4.12.Data protection and confidentiality of information.....	9
4.13.Opposition to criminal activities.....	10
5.RULES OF CONDUCT.....	10
5.1.Protection of members.....	10
5.2.Transparency to the market.....	10
5.3.Administrative Body.....	10
5.4.Rules of conduct toward employees and contractors.....	11
5.4.1.Business Conduct	11
5.4.2.Staff selection, development and training.....	11
5.4.3.Worker Safety and Work Environment.....	12
5.4.4.Obligations for all employees.....	13
5.4.5.Additional obligations for heads of business functions.....	13
5.4.6.External effectiveness of the Code.....	13
5.4.7.Use of corporate assets.....	13
5.4.8.Conflict of interest.....	14
5.4.9.Competitive practices.....	14

5.4.10. Gifts and benefits.....	15
5.4.11. Transparency in every operation and activity.....	15
5.4.12. Accounting transparency.....	15
5.4.13. Use of banknotes, public credit cards, revenue stamps.....	16
5.4.14. Internal controls.....	16
5.4.15. Computer systems.....	16
5.4.16. Transparency and fairness of information.....	18
5.4.17. Tools and signs of recognition and copyright protection.....	18
5.5. Rules of conduct toward customers.....	18
5.5.1. Impartiality and fairness.....	18
5.5.2. Communications	19
5.5.3. Management of credit positions.....	19
5.6. Rules of conduct toward suppliers.....	19
5.6.1. Collaborative relationships.....	19
5.6.2. Objective evaluation.....	19
5.6.3. Partners.....	20
5.7. Rules of conduct towards the public administration.....	20
5.7.1. Fairness and honesty.....	20
5.7.2. Labor relations with former civil servants.....	21
5.7.3. Grants and funding.....	21
5.8. Rules of conduct toward judicial authority.....	21
5.9. Rules of conduct toward political forces and interest-bearing associations.....	21
5.9.1. Relations with representatives of political forces and associations.....	21
5.9.2. Contributions and sponsorships.....	22
5.10. Rules of conduct toward the environment.....	22
5.11. Rules of conduct toward press organs.....	22
6. IMPLEMENTATION METHODS AND SUPERVISION PROGRAM.....	22
6.1. Communication and training.....	22
6.2. Violation of the Code of Ethics and Sanctions.....	23
7. FINAL PROVISIONS.....	23
7.1. Conflict with the Code.....	23
7.2. Changes to the Code.....	23

•FOREWORD

CERERIA INTRONA S.R.L. has adopted this Code of Ethics and Conduct in order to ensure that the Company's fundamental ethical values are clearly defined and serve as a constant reference for everyone in the conduct of business.

Taking its cue from our company's goal of creating value for itself, its Customers, its employees and society, it is natural to share, internalize and adopt behaviors marked by a constant respect for values such as honesty, moral integrity, transparency, reliability and a sense of responsibility for maintaining the prestige and accountability that comes from the way we have achieved important results in size and operational efficiency.

This document is the fruit of this reflection and represents a set of concrete norms and principles to be inspired by and adhered to, which must represent the fundamental basis of all our activities and define the guidelines to which behavior in internal and external relations must be guided.

This Code of Ethics is in force from the day of its approval and is valid for the Administrative Body, for all Employees of the Company, for all those who work permanently or temporarily on behalf of the company, and for all those who establish relationships of any kind with **CERERIA INTRONA S.R.L.**

The Code is a natural continuation of the work done in recent years in representing what is and will be the culture in which we find ourselves united and which gives strength to our corporate mission. Its concrete effectiveness depends on being in tune with the principles, values and behavior of each individual member of the company and, above all, on the ability of each person to frame his or her responsibilities within the framework of a collective history that characterizes us and that will follow us.

1.INTRODUCTION

This document, referred to as the "Code of Ethics and Conduct" (hereinafter, also "**Code**") is an official document that expresses the commitments and ethical responsibilities in the conduct of business and corporate activities assumed by **CERERIA INTRONA S.R.L.** (hereinafter, also "**Company**" or "**Company**" or "**Entity**"). It also regulates the set of rights, duties and responsibilities that **CERERIA INTRONA S.R.L.** expressly assumes towards those with whom it interacts in the conduct of its business.

As for the collaborators, consultants and self-employed workers who perform their activities in favor of the Company and other third parties, signing this Code or an excerpt from it, or, in any case, adhering to the provisions and principles set forth therein, represents a *conditio sine qua non* of the stipulation of contracts of any nature between the Company and such parties; the provisions thus signed or, in any case, approved, even by concluding facts, constitute an integral part of the contracts themselves.

Due to the foregoing, any violations by third parties of specific provisions of the Code, depending on their seriousness, may legitimize the Company's termination of existing contractual relationships with such parties and may also be identified ex ante as causes for automatic termination of the contract pursuant to Article 1456 of the Civil Code.

1.RECIPIENTS

Moral integrity is a constant duty for all those who work for **CERERIA INTRONA S.R.L.** and characterizes the behavior of the entire organization.

The rules of the Code apply indiscriminately to employees of the Company and to all those who work to achieve the objectives of the Company.

The Code of Ethics is, therefore, directed to the corporate bodies and their members, employees, workers, including temporary ones, consultants and collaborators in any capacity, as well as all those who, directly or indirectly, permanently or temporarily, establish and maintain relations or relationships with **CERERIA INTRONA S.R.L.** (hereinafter, also "**Recipients**").

Recipients of this Code are required to learn its contents and abide by its precepts as specified below.

In particular, the Governing Body, in setting corporate objectives, undertakes to be guided by the principles contained in the Code and is responsible for the effective implementation of the Code and its dissemination within and outside the Company.

The Company's employees, in addition to the compliance per se due to the regulations in force and the provisions provided for by collective bargaining, undertake to adapt the manner in which they perform their work activities to the purposes and provisions set forth in this Code; this, both in intra-company relations and in relations with parties external to the Company and, in particular, with the Public Administrations and other Public Authorities.

An inescapable requirement of any profitable relationship with the Company is compliance by collaborators and other third parties with the principles and provisions contained in this Code. In

this sense, when entering into contracts or agreements with collaborators or other third parties, the Company equips its interlocutors with this Code of Ethics or a meaningful excerpt thereof.

1. OUR VALUES

CERERIA INTRONA S.R.L., headquartered in Bitonto at S.S. 98 at Km, 77+769 and with a showroom in Bari at Via Nicola de Giosa No. 51, has **been** operating in the world of wax **since 1840**, when the founder, **Nicola Introna**, decided to develop an activity according to the needs of the moment in Southern Italy and, therefore, also in Apulia, a land where worship and religiosity have a wide following in the soul of the people. He therefore starts a wax factory specializing in the **creation of handmade waxes**.

Since then, only the deep and true passion for one's work, handed down from father to son, has enabled the company to also continuously expand the gift and art market with many different and sought-after items. The company has also developed commercially in other countries and today alternates between industrial and handicraft activities.

The Company considers work ethics, service quality, worker safety, and environmental protection to be the core values that should guide management in making business decisions.

The primary objective of **CERERIA INTRONA S.R.L.** is, in fact, the creation of value for itself, its Customers, its employees and the society in which it operates.

The Company is committed to respecting and enforcing the applicable laws of the state and states in which it does business and the ethical principles of common acceptance in the conduct of its activities. It rejects and stigmatizes the use of illegitimate or otherwise improper conduct in order to achieve its economic objectives, which are pursued exclusively with the excellence of performance in terms of quality and convenience of the services offered to our Clients, based on experience, attention to the Client and innovation.

1. GENERAL PRINCIPLES

The Code of Ethics constitutes a set of principles and guidelines, the observance of which is of fundamental importance for the achievement of social and economic objectives, for the smooth conduct of activities, for the reliability of management and the image of **CERERIA INTRONA S.R.L.** Therefore, both internal and external operations, conduct and relationships of the **Company** are inspired by these principles.

1.1 Responsibility

Each recipient individually and collectively undertakes to take responsibility for the consequences with respect to the commitments made, ensuring professionalism, diligence, efficiency and fairness of the activity by using the tools and time at his or her disposal in the best way possible.

1.1 Respect for the person

CERERIA INTRONA S.R.L. is committed to respecting the rights, physical, cultural and moral integrity of all persons with whom it deals. The centrality of the Person is expressed in particular through the enhancement of its collaborators (whether they are employees or linked by other working relationships), the attention paid to the needs and requests of Customers, fairness and

transparency in negotiations with suppliers and the Public Administration, and active participation in social life.

Demands, accompanied by threats or other violence, aimed at inducing Directors, employees and external collaborators to act against the Law and the Code of Ethics are not tolerated and are sanctioned.

1.1 Fairness (impartiality and solidarity)

In relations with stakeholders, in contacts with the Community and the Public Administration, in communications to shareholders, in personnel management and work organization, in the selection and management of suppliers, **CERERIA INTRONA S.R.L.** avoids any discrimination on the basis of age, gender, sexuality, health status, race, nationality, political opinions and religion of its interlocutors.

CERERIA INTRONA S.R.L. undertakes, in short, to operate in a fair and impartial manner, adopting the same behavior toward all interlocutors with whom it comes into contact, even in the different forms of relationship and communication required by the nature and institutional role of the interlocutors.

In the face of disadvantaged situations (state of need, handicap), solidarity is the address that ensures fair treatment.

1.1 Honesty and fairness

CERERIA INTRONA S.R.L. is constantly striving to comply with all regulatory requirements and to develop programs and procedures to ensure their implementation and control.

Within the scope of their professional activities, the Administrative Body, employees and collaborators of **CERERIA INTRONA S.R.L.** are required to diligently comply with current legislation, the Code of Ethics, regulations and internal provisions. Under no circumstances may the pursuit of the Company's interest or advantage justify dishonest conduct.

1.1 Prevention of corruption

In the conduct of its activities **CERERIA INTRONA S.R.L.** prohibits any action towards or by third parties aimed at promoting or favoring its interests, taking advantage of them, or capable of impairing impartiality and autonomy of judgment.

CERERIA INTRONA S.R.L. does not permit the payment or acceptance of sums of money or gifts to/from third parties for the purpose of procuring direct or indirect advantages for the Company; on the other hand, it is permitted to accept or offer gifts that fall within the customary uses of hospitality, courtesy and for special occasions, within the limits provided by the Anti-Corruption Law.

1.1 Tax compliance

The Company undertakes to carry out with completeness and transparency all the tax obligations imposed on it by current regulations and to cooperate, where required, with the tax authorities.

Tax returns and tax payments represent behaviors that are not only mandatory from a legal standpoint, but also inescapable in the context of corporate social responsibility. It is absolutely contrary to the interest of the Society to violate any of the prohibitions specified below.

The recipient of this Code shall not in any way commit or conspire with others to commit criminal violations of tax law.

1.1Smuggling

The Company is committed to complying with current regulations on monopoly goods and the suppression of smuggling, taking measures to ensure compliance with the relevant provisions.

CERERIA INTRONA S.R.L. sensitizes employees, collaborators and all those who work on behalf of or for it on issues related to compliance with the requirements, prohibitions and limitations established by the aforementioned regulations.

The Company shall ensure that those charged with dealing with Customs Authorities are identified in advance.

Responsibilities related to the circulation of products are expressly regulated at the contractual level with suppliers and customers.

Control over suppliers and customers is ensured through the application of specific procedures.

1.1Cultural heritage protection

The Company prides itself on business management consistently oriented toward safeguarding the principles and provisions on the protection of cultural heritage.

It is absolutely contrary to the interest of the Society to violate any of the prohibitions specified below.

The recipients of this Code shall not in any way commit or conspire with others to violate the regulations on crimes against cultural heritage.

1.1Protection of individual personality

CERERIA INTRONA S.R.L. supports and respects human rights, in accordance with the UN Universal Declaration of Human Rights. It recognizes the need to protect individual freedom in all its forms and repudiates any manifestation of violence, especially if aimed at restricting personal freedom, as well as any phenomenon of prostitution and/or child pornography.

CERERIA INTRONA S.R.L. is committed to protecting the moral integrity of its collaborators by guaranteeing the right to working conditions that respect the dignity of the person; for this reason it safeguards workers from acts of violence, opposing any attitude or behavior that is discriminatory or harmful to the person, his beliefs and preferences.

Sexual harassment is strictly forbidden, and behavior or speech that may upset a person's sensibilities must be avoided.

An employee of the Company who believes that he or she has been subjected to harassment or has been discriminated against because of age, sex, race, health status, nationality, political opinions, or religious beliefs may report the incident to the immediate supervisor for evaluation of the affective violation of both the Code and legal and/or contractual regulations.

1.1 Effectiveness and efficiency

CERERIA INTRONA S.R.L. is committed to continuously improving the effectiveness and efficiency of business processes, through the preparation and adherence to plans for the improvement of service quality and through the adoption of technological and organizational solutions aimed at combining the satisfaction of the needs of the served territory and its communities with the efficiency and economy of management.

These principles imply that each recipient of the code should always be oriented in his or her behavior toward sharing the company's mission, cooperating with colleagues and pursuing the company's goals and objectives.

1.1 Transparency

The principle of transparency is based on truthfulness, accuracy and completeness of information and clarity of communication both outside and inside the Company.

The Governing Body, employees and external collaborators of **CERERIA INTRONA S.R.L.** are committed to providing complete, correct, adequate and timely information both outside and inside the Company.

Information is made in a clear and simple manner, usually provided by written communication.

The communication of **CERERIA INTRONA S.R.L.** to the outside world is marked by respect for the right to information and under no circumstances is it permitted to divulge false or tendentious news or comments; all forms of communication comply with the laws, rules, and practices of professional conduct and are carried out with clarity, transparency and timeliness, safeguarding, among others, *price sensitive* information, and trade secrets. Any form of pressure or acquiring favorable attitudes from the media is prohibited. The complaint verification and resolution system implemented with respect to Clients must allow for information to be provided through both verbal and written communication that is constant and timely, clear and comprehensive, within the predetermined response time.

1.1 Data protection and confidentiality of information

CERERIA INTRONA S.R.L. ensures the confidentiality of personal and sensitive data in its possession, in accordance with the current legislation on Privacy.

The Administrative Body, employees and external collaborators of **CERERIA INTRONA S.R.L.** are prohibited from using confidential information for purposes unrelated to the performance of their duties or assigned tasks.

In addition, it is prohibited to use and disclose both internally and externally, confidential information that must remain appropriately protected.

Confidential information is:

- Business Plans, strategic, economic/financial, accounting, business, management, operational;

- Investments;

- Data related to personnel, Clients, Suppliers, and in general all data defined as personal by current privacy legislation, with particular attention to what the law defines as sensitive;
- The business parameters of performance and productivity;
- Business agreements and contracts, business documents;
- Databases.

1.10 Opposition to criminal activities

CERERIA INTRONA S.R.L. is committed to cooperating with institutions and supervisory authorities in order to contribute to the fight against crime, with particular regard to combating the phenomena of laundering of proceeds related to illegal activities, financing of terrorist activities and more generally the dangers of infiltration of organized crime into business activities.

1. RULES OF CONDUCT

The rules of conduct contained in this section are intended to indicate the behaviors to be observed in carrying out the various company activities in accordance with the values that inspire this Code.

These rules are divided in relation to the subjects with whom **CERERIA INTRONA S.R.L.** relates in the performance of its activities.

1.1 Protection of members

CERERIA INTRONA S.R.L. is committed to providing its Members with accurate, truthful and timely information and to improving the conditions of their participation, within the scope of their prerogatives, in corporate decisions through the pursuit of its mission and by socially responsible management of the sectors in which it operates.

1.1 Transparency to the market

The Company pursues its mission by ensuring full transparency with fair and comprehensive outward communication of choices made and information on management performance. Therefore, it provides complete, fair, symmetrical and timely information so that the decisions of shareholders and investors can be based on the company's strategic choices and management performance.

Communications, insofar as they are fair and transparent, are never aimed at gaining an undue advantage or interest for **CERERIA INTRONA S.R.L.**

1.1 Administrative Body

The Administrative Body performs its functions with professionalism, autonomy, independence, and responsibility to the Company, ownership, and third parties.

The Top Management Body must have awareness of its role and responsibilities, as well as sensitivity to its function, serving as an example for those working in the Society.

The Administrative Body must not prevent or hinder the exercise of control activities by the bodies in charge. In addition, it is obliged to be involved in and facilitate the operation of the company's control system, making employees aware of this.

In addition to its own responsibilities, the Governing Body is committed to scrupulously enforcing the values set forth in the Code of Ethics, promoting its sharing and dissemination to third parties as well.

1.1 Rules of conduct toward employees and contractors

1.1.1 Business Conduct

CERERIA INTRONA S.R.L. conducts business ethically, honestly and in compliance with the law and its regulations.

Collaborators (understood as the Administrator, employees and those who, regardless of the legal qualification of the relationship, operate under the direction or supervision of **CERERIA INTRONA S.R.L.**) must be guided by the principles of honesty in any area of business, respect toward interlocutors and protection of confidential information held.

In compliance with legal regulations, collaborators must behave in a helpful manner toward the Administrative Body, any other corporate and supervisory bodies, and supervisory authorities.

1.1.1 Staff selection, development and training

CERERIA INTRONA S.R.L. recognizes the centrality of human resources in the belief that the main factor of success of any business is the professional contribution of the people working in it, within a framework of loyalty and mutual trust. Therefore, at the stage of selection, recruitment and career advancement of personnel, **CERERIA INTRONA S.R.L.** makes evaluations exclusively on the basis of the correspondence between expected and required profiles and to transparent and verifiable considerations of merit, consistent with defined procedures. The management of labor relations is oriented toward ensuring equal opportunities and fostering the professional growth of employees.

The Company, in its personnel selection processes, does not discriminate, directly or indirectly, on the basis of trade union, political, religious, racial, language or gender grounds.

The Company undertakes not to favor in any way candidates referred by third parties, and especially those who are part of the Public Administration.

Personnel are hired under regular labor contracts, as no form of illegal and/or exploitative labor is tolerated.

CERERIA INTRONA S.R.L. provides all workers with equal employment opportunities, making sure that everyone can enjoy fair treatment, without any discrimination.

In addition, the company rejects any action that would constitute abuse of authority and violate the dignity and mental and physical integrity of the person.

The Company, as part of its personnel training processes, provides for the establishment of training courses in which selected employees must compulsorily participate. These courses are aimed at providing staff with correct and detailed information on particular sensitive areas such as, merely by way of example with reference to safety at work: emergency management in the workplace, fire prevention, use of video terminals and other electronic equipment, etc.

The Company delivers to all employees the necessary documentation to train them on sensitive and particularly relevant issues.

1.1.1 Worker Safety and Work Environment

CERERIA INTRONA S.R.L. considers the protection of worker safety to be of primary importance. All collaborators are required, within the scope of their activities, to consider aspects related to safety at work with the same application and intensity.

Primary objectives of the Company are, therefore, the health of employees, outside contractors and the communities affected by the same activities.

The Company's activities must be conducted in full compliance with current regulations and directives on worker prevention and protection and occupational safety.

The improvement of occupational health and safety conditions must be a constant focus in the operational management of corporate objectives.

The basic principles and criteria on the basis of which decisions of all kinds and at all levels are made regarding occupational health and safety are identified as follows:

- a) risk avoidance;
- b) Assess risks that cannot be avoided;
- c) Combat risks at the source;
- d) adapt work to human beings, particularly in the design of workplaces and the choice of work equipment and working methods, especially to mitigate monotonous and repetitive work and to reduce the health effects of such work;
- e) Take into account the degree to which the technique has evolved;
- f) Replace what is dangerous with what is not dangerous or is less dangerous;
- g) planning prevention, aiming for a coherent whole that integrates in it technique, work organization, working conditions, social relations and the influence of factors in the work environment;
- h) Give collective protective measures priority over individual protective measures;
- i) Give appropriate instructions to workers.

All employees are involved and thus called upon to take an active part in improving safe working conditions and preserving the working environment.

Employees, each within the scope of his or her duties, take part in the process of identifying and preventing risks and protecting the health and safety of themselves, colleagues and third parties. Smoking is not allowed in workplaces marked with the appropriate ban.

1.1.1 Obligations for all employees

Every employee is required to be familiar with the provisions contained in or referred to by the Code, as well as with the relevant legal regulations that govern the activity carried out within the scope of his or her function and that form an integral part of each person's work performance.

An employee who becomes aware of alleged misconduct is required to report the information he or she has about such conduct only to his or her superiors.

Employees are also obliged to:

- a) To refrain from conduct contrary to these provisions and regulations;
- b) Contact their superiors for necessary clarifications on how to apply the Code or relevant regulations;
- c) Cooperate with the Company in the event of any investigations aimed at verifying and possibly sanctioning possible violations.

1.1.1 Additional obligations for heads of business functions

Each Corporate Function Manager has the obligation to:

- a) Ensure compliance with the Code by their direct subordinates;
- b) To set an example for their subordinates and co-workers by their behavior;
- c) Ensure that employees understand that the provisions contained in the Code are an integral part of their job performance;
- d) Select employees and collaborators who are committed to the principles in the Code.

Failure by Function Managers to comply with the obligations set forth in this paragraph may result in disciplinary sanctions, including dismissal.

1.1.1 External effectiveness of the Code

Anyone who, acting in the name or on behalf of **CERERIA INTRONA S.R.L.**, comes into contact with third parties with whom the Company intends to enter into business relations or is obliged to have relations of an institutional, social, political or any other nature with them, is obliged to:

- a) To inform these parties of the commitments and obligations imposed by the Code;
- b) Require compliance with the obligations of the Code in the performance of their activities;
- c) Take the necessary internal initiatives in the event of refusal by third parties to comply with the Code or, in the event of failure or partial performance of the commitment made, to comply with the provisions contained in the Code.

1.1.1 Use of corporate assets

Each employee is expected to work diligently to protect company assets, observing responsible behavior and in line with company policies.

In particular, all employees of **CERERIA INTRONA S.R.L.**:

- shall protect the company's devices, using the technical measures necessary to prevent breakage or deterioration;
- shall not misappropriate or damage tangible or intangible assets owned by or in use by the Company, including computer assets;
- shall not falsify or alter company data, documents, equipment, procedures or software or duplicate, install and/or possess programs and any other software products without explicit authorization;
- may not make use of means of communication, computer equipment, network connections, or anything else owned or used by the Company for reasons other than service;
- shall report any loss, waste or theft of company materials;
- shall keep **CERERIA INTRONA S.R.L.** and, confidential, information of its customers.

1.1.1 Conflict of interest

All employees must ensure that every decision made within the scope of their activities is made in the interest of **CERERIA INTRONA S.R.L.** and not their own personal interest.

All collaborators (employees, Director, etc.) are required to avoid any activity or situation of personal interest that constitutes or may constitute, even potentially, a conflict between individual interests and those of the Company and, in any case, shall comply with the specific *policies* adopted by the Company in this regard.

No employee may use his or her employment position in **CERERIA INTRONA S.R.L.** to obtain favors or favor for himself or herself, members of his or her family, or persons with whom he or she has a personal relationship. This applies to product purchases, product sales, hiring, promotions, partner selection, suppliers or any other situation related to the company.

Any exception must be approved by the Administrative Body.

1.1.1 Competitive practices

It is of primary importance to **CERERIA INTRONA S.R.L.** that the market be based on fair and equitable competition.

CERERIA INTRONA S.R.L. is committed to strict compliance with relevant laws and cooperation with market regulatory authorities.

The Company does not engage in unlawful, or otherwise unfair, conduct for the purpose of gaining possession of trade secrets, Customer or supplier lists, or information related to the infrastructure or

other aspects of third parties' business activities. The Company also does not hire employees from competing companies for the purpose of obtaining information of a confidential nature, nor does it induce personnel of competing companies to disclose information that they cannot disclose.

1.1.1 Gifts and benefits

No form of gift that can even be interpreted as exceeding normal business practices or courtesy, or in any case aimed at acquiring favorable treatment in the conduct of any activity that can be linked to the Company, is allowed. This rule - which does not allow for exceptions even in those countries where offering gifts of value to business partners is customary - concerns both gifts promised or offered as well as those received, with gift meaning any kind of benefit.

The Company refrains from practices that are not permitted by law, business practices or codes of ethics, if known, of the companies or entities with which it has dealings.

In any case, the offering of gifts by the Company-except those of modest value-must be in accordance with the rules set forth in this article:

- (a) The offering of gifts to members of the Public Administration, public officials, persons in charge of public services or public officials is allowed within the limits of L.190/2012;
- (b) In the case of gifts intended for persons not in category (a), the offer must be:
 - communicated in advance to the head of the function involved;
 - Expressly approved by the head of the function involved;
 - adequately documented in order to allow for appropriate verification.

1.1.1 Transparency in every operation and activity

Every operation and/or activity must be lawful, authorized, consistent, documented, verifiable, in accordance with the principle of traceability and company procedures, according to prudent criteria and to protect the interests of **CERERIA INTRONA S.R.L.**:

- company procedures must allow controls to be carried out on operations, authorization processes and the execution of those operations;
- any employee who engages in transactions involving sums of money, goods or other economically valuable utilities belonging to the Company shall reasonably provide appropriate evidence to enable the verification of such transactions.

1.1.1 Accounting transparency

The Company's accounting meets the generally accepted principles of truth, accuracy, completeness and transparency of the recorded data.

The Recipients of this Code undertake to refrain from any behavior, whether active or omissive, that directly or indirectly violates regulatory principles and/or internal procedures pertaining to the formation of accounting documents and their external representation.

In particular, the Recipients of this Code undertake to cooperate to ensure that every operation and transaction is promptly and correctly recorded in the company's accounting system in accordance

with the criteria indicated by the law and applicable accounting standards, as well as duly authorized and verified, if applicable.

Recipients of this Code are also required to keep and make available, for each operation or transaction carried out, adequate supporting documentation in order to enable them:

- a) The accurate accounting record;
- b) immediate identification of the underlying characteristics and motivations;
- c) the easy formal and chronological reconstruction;
- d) The verification of the decision-making, authorization and implementation process in terms of legitimacy, consistency and appropriateness, as well as the identification of the various levels of responsibility.

Recipients of this Code who become aware of instances of omission, falsification or carelessness in accounting records or supporting documentation are required to report them promptly to their supervisor.

1.1.1 Use of banknotes, public credit cards, revenue stamps

CERERIA INTRONA S.R.L., sensitive to the need to ensure fairness and transparency in the conduct of business, requires Recipients to comply with current regulations on the use and circulation of coins, public credit cards and revenue stamps, and therefore severely sanctions any behavior aimed at the illicit use as well as the circulation of credit cards, revenue stamps, counterfeit coins and banknotes.

1.1.1 Internal controls

CERERIA INTRONA S.R.L. promotes at every level the assumption of a control-oriented mentality. A positive attitude toward controls contributes significantly to the improvement of business efficiency.

Internal controls are defined as all the tools adopted by the Company for the purpose of directing, managing and verifying the activities of the enterprise with the aim of ensuring compliance with laws and company procedures, protecting company assets, efficiently managing activities and providing accurate and complete accounting and financial data.

Every level of the organizational structure is responsible for contributing to the establishment of an effective and efficient internal control system. For this reason, consequently, all employees of the Company, within the scope of their respective functions and duties, are responsible for the proper functioning of the control system.

The Company ensures that any corporate bodies holding powers of control have access to data, documentation and any information useful for the conduct of its business.

1.1.1 Computer systems

Granted that the use of the company's IT and telematic resources must always be inspired by the principles of diligence and fairness - attitudes that are destined to support any act or behavior carried out within the work relationship - Employees and assimilated Collaborators are in any case required

to adopt the additional internal rules of common behavior, aimed at avoiding inappropriate and/or improper conduct, which may cause damage to the Company, other Employees or third parties (such as suppliers, business and financial partners, negotiating counterparties, consultants and third parties in general) who have relations with the Company, in compliance with the provisions and/or indications provided by the competent corporate functions: all - in any case - in compliance with the regulations on *privacy* and the provisions on official secrecy.

The personal computer (fixed or mobile), related external media and peripherals, mobile communication systems and related programs and/or applications entrusted to the Employee and/or assimilated Collaborator are, as is well known, work tools and, therefore, must be properly guarded with respect, on the part of each interested party, of the instructions given in application of the provisions of the regulations of *privacy* and office secrecy as well as internal regulations for the protection and defense of company assets, and with a commitment to promptly report the theft, damage or loss of such tools to one's superior.

In addition, every communication (internal and external), sent or received, that has relevant content or contains commitments for the Company, must be viewed and signed, respectively, by the responsible individuals, within the limits of the delegated powers and powers of attorney conferred.

Since in the event of violations of rules of a legislative, regulatory and contractual nature, both the Company and the individual Director or Attorney or Employee or assimilated Collaborator are liable to penalties, including penalties of a criminal nature, the Company will verify, to the extent permitted by legal and contractual regulations, compliance with the rules and the integrity of its computer system, using, if deemed necessary, specialists in the field.

Failure to comply with the requirements of the Code may result in not only disciplinary, but also civil and criminal penalties.

To Employees and assimilated Collaborators of the Company:

- a) browsing sites not related to the performance of assigned duties is not allowed;
- b) Participation, for non-professional reasons, in *forums*, *blogs*, *social networks*, the use of *chat lines*, electronic bulletin boards, and *guest book* entries even using pseudonyms (or *nicknames*) is not permitted;
- c) storage of computer documents of an outrageous and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion, and union and/or political affiliation is not permitted;
- d) it is strictly forbidden in any case to connect to or otherwise access sites whose contents may give rise to crimes against the person included in the Decree (reduction or maintenance in slavery or servitude, child prostitution, child pornography and related crimes, trafficking in persons, purchase and sale of slaves).

In pointing out that e-mail is also a work tool and that it is not allowed to be used for personal use, it is considered useful to point out to all Employees and assimilated Collaborators of the Company that:

- a) messages (internal and external) of an outrageous and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion, and union and/or political affiliation may not be sent or stored;
- b) any communication (internal and external), sent or received, or containing commitments to the Company, must be made through company devices;
- c) Use of the company e-mail address for non-business purposes is not permitted.

1.1.1 Transparency and fairness of information

Employees must ensure, within the scope of their own knowledge, truthfulness, transparency, accuracy and completeness of the documentation and information rendered in the performance of the activity under their responsibility.

CERERIA INTRONA S.R.L. condemns any behavior aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law and directed to shareholders, the public, and the Supervisory Authorities.

All persons who participate in the formation of the aforementioned acts, and in particular the Administrative Body and the managers of **CERERIA INTRONA S.R.L.**, are obliged to verify, with due diligence, the correctness of the data and information that will then be transposed for the drafting of the aforementioned acts and to provide such data and information in a timely manner.

CERERIA INTRONA S.R.L., through its organs and delegated persons, ensures the utmost transparency and attention to the relationship with the corporate control bodies or the auditing company, if appointed.

1.1.1 Tools and signs of recognition and copyright protection

The Company safeguards intellectual property rights, including copyrights, patents, trademarks and identifying marks, by adhering to the policies and procedures set forth for their protection and also respecting the intellectual property of others, in all the Company's activities including with reference to the management of corporate marketing. It is therefore contrary to the Company's policies to unauthorized reproduction of software, documentation or other copyrighted materials. In particular, the Company complies with the restrictions specified in the licensing agreements relating to the production-distribution of third-party products, i.e., those entered into with its software suppliers, and prohibits the use or reproduction of software or documentation outside what is permitted under each of those licensing agreements.

The Company prohibits any behavior intended to result in the loss, theft, unauthorized dissemination or misuse of its own or others' intellectual property or confidential information. To this end, the Company undertakes to activate all preventive and subsequent control methods necessary for the purpose, ensuring compliance with the regulations on copyrights, as well as on the protection of identifying marks, such as trademarks and patents. The Company also stigmatizes the use of databases (extraction, reproduction of data, public presentation, etc.) for purposes other than for which they were established and, in any case, contrary to what is permitted by copyright protection regulations.

The Company condemns any conduct engaged in for the purpose of illegally taking possession of trade secrets, supplier lists and other information pertaining to the business.

1.1 Rules of conduct toward customers

1.1.1 Impartiality and fairness

CERERIA INTRONA S.R.L. considers important the relationship with its Clients, meaning all subjects, public and private, who use its services and, for this reason, it is committed to imprinting it on the principles of loyalty, fairness, transparency, trust and mutual satisfaction, paying the utmost attention to the quality and safety of the services provided, of its own processes and business places as well as its own equipment, plant and machinery.

For business purposes, customers, suppliers and others share confidential information with **CERERIA INTRONA S.R.L.**. It is the responsibility of each employee to protect and maintain the confidentiality of this information.

1.1.1 Communications

Communications to customers are:

- clear and simple, formulated in language as close as possible to that used by the interlocutors;
- complying with current regulations, without resorting to elusive or otherwise unfair practices;
- complete, so that no element relevant to the Client's decision is overlooked;
- true and not misleading as to communication content.

1.1.1 Management of credit positions

CERERIA INTRONA S.R.L. undertakes not to abuse its credit positions towards its Customers, in order to take advantage of them or any other benefit.

In credit recovery, **CERERIA INTRONA S.R.L.** acts according to objective and documentable criteria by applying the following principles:

"Initiation of recovery procedures starting with the oldest creditor positions;

"Prior information to the debtor about the position and amount of the claim asserted.

Consistent with corporate interests **CERERIA INTRONA S.R.L.** favors the amicable resolution of any disputes.

1.1 Rules of conduct toward suppliers

1.1.1 Collaborative relationships

CERERIA INTRONA S.R.L. establishes collaborative relationships with its suppliers, in compliance with current regulations and the principles of this Code, paying attention to the best professional standards, best practices in ethics, health and safety protection and respect for the environment.

1.1.1 Objective evaluation

The Company's supplier selection procedures--based on objective and verifiable benchmarks--will take into consideration, among others, cost-effectiveness, technical capability, reliability, product quality, the supplier's compliance with the quality procedures adopted by the Company, and the credentials of its contractors.

In any case, the responsible functions are obliged to ensure - where possible - equal opportunities for supplier companies that meet the requirements. As part of the procedures for choosing suppliers, the Company adopts periodic monitoring mechanisms aimed at verifying the continued existence over time of the aforementioned requirements in the suppliers themselves.

CERERIA INTRONA S.R.L. is committed to not arbitrarily discriminating against its suppliers.

In dealings with suppliers, Recipients of this Code may not accept compensation, gifts, or favorable treatment that does not comply with the conditions indicated above.

It is, however, incumbent on the Recipients of this Code to inform the head of the department involved of offers received in this regard.

Similarly, it is forbidden to offer or pay gifts or favorable treatment to the aforementioned subjects that do not comply with the stipulated conditions.

1.1.1 Partners

CERERIA INTRONA S.R.L., in order to cope with the increasing complexity of the *business*, may promote initiatives, such as *joint ventures* or participations in companies, jointly with business *partners*, who are chosen in relation to reputation and reliability, as well as adherence to values comparable to those expressed in this Code.

Relationships with *partners* are based on transparent agreements and constructive dialogue aimed at achieving common goals, consistent with the regulations and principles of this Code.

1.1 Rules of conduct towards the public administration

1.1.1 Fairness and honesty

In its relationship with the Public Administration **CERERIA INTRONA S.R.L.** inspires and adjusts its conduct to the principles of fairness and honesty.

The persons entrusted by **CERERIA INTRONA S.R.L.** to follow any negotiation, request or institutional relationship with the Public Administration, whether Italian or foreign, must not for any reason seek to improperly influence its decisions, nor engage in unlawful conduct, such as offering money or other benefits, that may alter the impartiality of judgment of the representative of the Public Administration.

Notwithstanding the above, any changes in the content of commercial offers addressed to Public Administrations are also prohibited if they are not authorized in advance by the head of the function involved and the Administrative Body.

1.1.1 Labor relations with former civil servants

Without prejudice to the provisions of the preceding paragraph, the hiring of former employees of the Public Administration, who in the performance of their duties have had relations with **CERERIA INTRONA S.R.L.**, or their relatives and/or relatives-in-law, shall take place in strict compliance with the standard procedures defined by the Company for personnel selection.

The establishment of other working relationships with former employees of the Public Administration, or their relatives and/or relatives-in-law, also takes place in strict compliance with standard procedures.

1.1.1 Grants and funding

Grants, subsidies or financing obtained from the European Union, the State or other Public Entity, even if of small value and/or amount, must be used for the purposes for which they were requested and granted.

Similarly, in the event of participation in public procedures, the Recipients of this Code are required to operate in compliance with the law and fair business practice, avoiding in particular to induce the Public Administrations to operate unduly in favor of the Company.

The use of altered or falsified statements or documents or the omission of information or, in general, the performance of artifice or deception, aimed at obtaining concessions, authorizations, financing, contributions from the European Union, the State or other Public Entity, also constitutes illegal conduct.

1.1 Rules of conduct toward judicial authority

It is forbidden for all Company Representatives to exert pressure, of any kind, on the person called to make statements before the judicial authorities, in order to induce him/her not to make statements or to make false statements. It is also forbidden to help those who have carried out a criminally relevant fact to evade the investigations of the authorities, or to evade the investigations of the authorities.

1.1 Rules of conduct toward political forces and interest-bearing associations

1.1.1 Relations with representatives of political forces and associations

CERERIA INTRONA S.R.L. consults transparently with all political forces in order to duly represent its positions on topics and issues of interest.

CERERIA INTRONA S.R.L. maintains relations with associations, environmental organizations and related associations with the aim of developing its activities, establishing mutually beneficial forms of cooperation and presenting its positions.

1.1.1 Contributions and sponsorships

CERERIA INTRONA S.R.L. is willing to provide contributions and sponsorships, in compliance with the defined procedures, giving adequate publicity, to support initiatives proposed by public and private entities and non-profit associations, duly constituted in accordance with the law and that promote the values that inspire this Code.

Sponsorships and contributions may relate to events and initiatives of a social, political, cultural sports and artistic nature; they may also be aimed at carrying out studies, research, conferences and seminars dealing with issues of interest to **CERERIA INTRONA S.R.L.**

1.1 Rules of conduct toward the environment

CERERIA INTRONA S.R.L. develops its activities pursuing the protection of the environment, setting as its goal the continuous improvement of performance in this particular area, also in consideration of the environmental impacts arising and derived from the activity carried out.

To this end **CERERIA INTRONA S.R.L.** commits itself to:

- Compliance with applicable national and international environmental regulations;
- To raise awareness of environmental issues among management and employees;
- To manage production activities while minimizing direct and indirect environmental impacts;
- To reduce emissions, waste and pollution;
- To reduce and make efficient consumption of natural resources.

1.1 Rules of conduct toward press organs

Relations with the press are marked by respect for the right to information.

External communication of data or information, must be truthful, accurate, clear, transparent, respectful of the honor and confidentiality of persons, coordinated and consistent with the policies of **CERERIA INTRONA S.R.L.** Information pertaining to the Company and directed to the press organs may only be disclosed by the corporate functions delegated to this, or with the authorization of these, in compliance with the defined procedures.

1. IMPLEMENTATION METHODS AND SUPERVISION PROGRAM

1.1 Communication and training

This Code is brought to the attention of all internal and external stakeholders in the company's mission through appropriate communication and training activities.

The Code of Ethics is made public by posting on the company bulletin board and publication on the company website in the public part. A copy of the Code of Ethics, in hard copy or digital format, is distributed upon request to Shareholders, the Administrator, employees and all third parties who enter into contractual relations with **CERERIA INTRONA S.R.L.**

1.1 Violation of the Code of Ethics and Sanctions

Violations of the principles and rules referred to in this Code by employees constitute a breach of the primary obligations of the employment relationship or wrongdoing at the disciplinary level and will be dealt with by the competent structures in compliance with the National Collective Labor Agreements in force and/or, if applicable, the Disciplinary Code.

Express termination clauses shall be included in professional collaboration and supply contracts for goods, services and labor in connection with conduct found to be contrary to the principles of this Code.

1.FINAL PROVISIONS

1.1 Conflict with the Code

In the event that even one of the provisions of this Code conflicts with provisions set forth in internal regulations or procedures, the Code shall prevail over any of these provisions.

1.1 Changes to the Code

Any amendments and/or additions to this Code shall be made in the same manner as adopted for its initial approval.

This Code is-at least annually-made the subject of review and possible updating by the Administrative Body.



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