



# **CODE OF ETHICS**

Approved by the Board of Directors of Rossi S.p.A. on February 07, 2024





For over 70 years, the Rossi Group has focused its attention on people and their importance, combining this with a passion for mechanical engineering and technology. The values that guide Rossi in the pursuit of our ethical principles have always been strictly linked to the quality, reliability and excellence of our products. At Rossi, we have always understood that one of the roots of our success is a distinctive and shared corporate culture based on our core values:

- Ambition - having a strong sense of commitment, and promoting teamwork and employee participation.
- Ethics - setting an example by acting with integrity, honesty and respect for rules.
- Pride - acting as the first ambassadors of our company, promoting the Rossi brand and preserving our reputation.
- Transparency - conveying clear communication in everything we do, in all aspects of our organization.
- Creative energy - driven by curiosity, and a positive and enthusiastic spirit.

Our determination to promote all these values throughout the entire Rossi family has led to a revision of our Code of Ethics (CE). At the same time, these principles must also be in keeping with those who desire to do business with us. Following these guidelines is essential for Rossi's collaborators in the complex social, cultural and economic contexts of today's world.

As Rossi's ambassadors, we are all responsible for preventing and reporting potential violations of the law. It is essential for each affiliated company to abide by local laws and regulations and comply with the Rossi Group Code of Ethics in order to preserve and enhance our reputation as a responsible employer. I urge everyone to apply our Code of Ethics in our daily activities, so that we can be sure of maintaining the quality, integrity and dedication of our contributions to the world.

We are Rossi!

Ivan Salamin  
CEO





# TABLE OF CONTENTS

	pag.
<b>1. INTRODUCTION</b>	7
1.1 Foreword	8
1.2 Purpose and scope of application	"
1.3 Recipients and general principles	9
<b>2. CORPORATE VALUES AND RULES OF CONDUCT</b>	11
2.1 Ethical principles	"
2.2 Compliance with the law	12
2.3 Relations with public administration	13
2.4 Relations with the judicial authority	15
2.5 Relations with representatives of political forces and interest groups	"
2.6 Money laundering, terrorism, and trafficking in firearms or drugs	16
2.7 Creating and maintaining business, consulting and partner relationships	"
2.8 Fairness in administration	18
2.9 Relations with the auditing company	19
2.10 Relations with the board of auditors	20
2.11 Conflict of interests	"
2.12 Protection of the person and personality rights	21
2.13 Protection of human resources	22
2.14 Health and safety in the workplace	23
2.15 Environment	25
2.16 Use and protection of company-owned assets	26
<b>3. ROSSI'S COMMITMENTS REGARDING THE DISSEMINATION, IMPLEMENTATION AND UPDATING OF THE CODE OF ETHICS</b>	29
3.1 Reporting requirements and requests for clarification	30
<b>4. DISCIPLINARY SYSTEM</b>	33
<b>5. IMPLEMENTATION OF THE CODE OF ETHICS</b>	35
5.1 Internal control	"
5.2 Ethical training	"





# 1. INTRODUCTION

**R**ossi S.p.A - part of Rossi International AG, part of Moovimenta AG - and all Rossi Group companies have adopted this Code of Ethics, in line with the Group's values, in order to mitigate the risks of irregularities and limit the danger of committing the offenses listed in Legislative Decree 231/2001.

The Code of Ethics (hereinafter the "Code") is an official document adopted autonomously by Rossi Group (hereinafter referred to as "Rossi" or the "Company") that formally defines the key principles and core values that Rossi is committed to upholding and enforcing in its business activities, and the standards of conduct to be observed by the corporate bodies and all Rossi employees and collaborators.

The Code, which is aimed at ensuring a high standard of ethics in the conduct of the Company's business, is also one of the tools prepared by the Company to ensure adequate prevention, detection and countering of violations of current laws applicable to the Company.

Rossi believes that ethical conduct in business is a necessary condition for its success as well as a tool for promoting its image. The Code is also the point of reference for all those who conduct business on behalf of; and in the interest of Rossi. This Code is the first formal step towards Rossi's adoption of a new Organization, Management and Control Model (hereinafter the "Model 231") defined to prevent the crimes listed in Legislative Decree 231/2001 (hereinafter the "Decree"). The Code is one of the essential protocols for the establishment of Model 231 and is an integral part of it, together with the system of sanctions (hereinafter "Disciplinary Code") which the Company has decided to adopt in order to reinforce the rules of the Code and the provisions of the Decree, and thus of Model 231. The Code complies with the principles set forth in the latest Confindustria Guidelines issued in June 2020.

**The Code also provides mandatory guidelines of conduct for all the foreign companies controlled by Rossi, in compliance with local laws.**

Any reference to the regulations and legislation of Italian law in the text of the Code should be considered valid and binding only in Italy.

## 1.1 FOREWORD

The Company pursues the achievement of economic sustainability through continuous improvement of its processes, aimed at balanced and sustainable growth of the company and its supply chains. In particular, Rossi adopts ethically responsible production models that respect and safeguard human rights, environmental well-being and the welfare of the community.

To this effect, Rossi promotes and implements a business model that combines its corporate objectives with the social and environmental objectives of the local area, from a perspective of total quality.

Rossi is aware that its business acquires value when based on credibility and reputation, intangible factors that are capable - in themselves - of creating tangible values. Accordingly, the Company promotes its products and services in compliance with all legal regulations and rules established to protect the interests of customers and fair competition.

The Company is conscious of the major role it plays in relation to the market, economic development and the well-being of the people who work and cooperate with them, as well as of the community where it is based.

Therefore, the Company deems it essential to clearly and firmly express its ideals, culture and values which underlie the behavior of its corporate boards, management and the people who work with, and for the Company towards public administration, customers, suppliers, credit institutes and the entire community, for the trust they place in the Company's operations.

## 1.2 PURPOSE AND SCOPE OF APPLICATION

This document was prepared by Rossi for the purpose of establishing a code of conduct, based on the core values of the Company and the Rossi Group, to serve as a clear reference for all activities in which it is involved in its internal and external relations.

This Code of Ethics (hereinafter also the "Code") thus defines the general principles of behavior that apply, without exception, to all those working to achieve the objectives of Rossi S.p.A. and all Rossi Group companies (also referred to as Rossi).

This Code of Ethics is an integral part and fundamental element of the Organization, Management and Control Model



governed by Legislative Decree no. 231/2001 and adopted by Rossi; therefore, the implementation of the Code is subject to the control of the Supervisory Board appointed in accordance with the aforementioned Legislative Decree no. 231/2001 and violation of its provisions is punishable in accordance with the aforementioned Model.

### 1.3 RECIPIENTS AND GENERAL PRINCIPLES

The recipients of the Code of Ethics are people assigned to the **governance** of the Company, employees, collaborators, consultants, third parties and all those who; directly or indirectly, establish permanent or temporary relations or relationships with the Company.

The Recipients must never fail to observe the fundamental principles that inspire the Code of Ethics, such as honesty, moral integrity, fairness, transparency and objectivity in their pursuit of the corporate objectives.

Each one, within the area of responsibility of their specific role, must provide the highest possible level of professionalism and perform their assigned activities with commitment, making a concrete contribution to the achievement of the corporate objectives.

Rossi has no wish to enter into, or continue relationships with anyone who proves unwilling to share the content or spirit of this Code, or who violates its principles or rules of conduct. In particular, since the actions taken by the Company's suppliers are sometimes attributed to the Company itself, and can affect its reputation, Rossi requires those bound by supply contracts with the Company to comply with the standards of the Code of Ethics.



## 2. CORPORATE VALUES AND RULES OF CONDUCT

### 2.1 ETHICAL PRINCIPLES

**R**ossi is aware of the essential social and environment role of its activities.

Rossi promotes and demands models of ethical behavior in the performance of work activities based on the principles of legality, good contractual faith, loyalty, fairness and transparency. All adopted behavior must be formally and substantially legitimate in order to protect and enhance Rossi's credibility, reputation, reliability and image.

Corruption, illicit gain and collusion are strictly prohibited without exception. Acceptance of money or gifts of any nature or amount is prohibited unless clearly shown to be mere acts of business courtesy, such as not to influence the behavior of the recipient; any fact to the contrary must be reported to one's immediate superior and/or the Supervisory Board.

Rossi promotes and develops behaviors among its staff that foster a sense of identification with the company, and an awareness that the professionalism of its activities can only be considered adequate if this commitment is shared and applied in practice by all its staff.

All Recipients, moreover, must take every possible precaution to avoid any form of discrimination or physical and psychological harassment, and, in particular, any discrimination based on race, nationality, sex, age, physical disability, sexual orientation, political opinion, trade union membership or religious belief.

Rossi promotes the sharing of information, dialogue and collaboration with the maximum transparency towards institutions, associations and the social context in which it operates. It is prohibited to make false statements to any institution, association or community.

## 2.2 COMPLIANCE WITH THE LAW

Acting in accordance with the law is a priority requirement for Rossi. Compliance with the law is an essential principle at Rossi. It is crucial that all employees and collaborators who represent Rossi including directors, associates and third parties comply with all current legislations and regulations. Furthermore, such practices must reflect Rossi principles and procedures with ethically correct conduct, while putting into effect the Code of Ethics standards to preserve and enhance our reputation as a responsible employer.

Under no circumstances may conduct in violation of current laws and regulations, or this Code, be considered beneficial to Rossi and, therefore, no one may consider themselves authorized to engage in such conduct under the pretext of benefit to the Company.

## 2.3 RELATIONS WITH PUBLIC ADMINISTRATION

Rossi pursues the goal of maximum integrity and fairness in its relations and contractual dealings with public institutions and local authorities, and with Public Administration in general. The Company also believes that the active involvement of various stakeholders, from local communities to public institutions, and from associations to university and research bodies, can be a key element for its own development. Their involvement is key in order to respond concretely to the needs of the local area and society in which it operates and promote their welfare and development.

All relations with Public Administration must be conducted in strict compliance with current laws, regulations and the principles enshrined in the Code of Ethics and Model 231, and must be based on the utmost transparency and fairness in order to ensure the absolute legitimacy of the Company's work.

Relations with Public Administration are conducted exclusively by company officers appointed and/or authorized to do so. All documentation concerning relations with Public Administration must be duly collected and preserved.

The operations carried out by the Company, as well as major contacts with Public Administration, must have adequate traceability; it must be possible to verify the decision-making, authorization and implementation processes for each of them.

Every operation must be adequately documented so that controls can be carried out at any time to (i) verify its characteristics and motives and (ii) identify the individuals who authorized, carried out, recorded and verified the operation.

The recipients of this Code are not permitted; either directly or indirectly through an intermediary, to offer or promise money, gifts or compensation, in any form whatsoever, or to exert unlawful pressure, or promise any object, service, performance or favor to Public Administration executives, officials or employees, or to persons entrusted with public service and their relatives or cohabitants, for the purpose of inducing them to perform an act that complies with; or is contrary to, official Public Administration duties (including for the purpose of favoring or damaging a party in a civil, tax, criminal or administrative process in order to directly or indirectly benefit the Company).

The only form of gifts permitted are those of negligible value, provided they are not aimed at inducing the above-mentioned persons to perform acts contrary to; or in accordance with, Public Administration duties and, in any case, must always comply with company procedures and with the obligation of reporting them to the Supervisory Board.

Anyone who receives explicit or implicit requests for benefits of any kind from persons in Public Administration; as defined above, must promptly inform their immediate superior and the Supervisory Board so that appropriate steps can be determined.

The requirements set forth in the preceding paragraphs shall not be circumvented by resorting to other forms of aid and contributions, which, in the guise of hiring; appointments; consulting; advertising; or other benefits, have similar purposes as those prohibited by this paragraph.

Rossi may provide contributions and sponsorships to support initiatives proposed by public and private bodies and nonprofit associations duly established in accordance with the law, and that promote Rossi's Ethical Principles.

The sponsorships and contributions may be for events and initiatives of a social, cultural, sporting or artistic nature; they may also be aimed at conducting studies, research, conferences and seminars on subjects of interest to Rossi.

It is not permissible to use or present statements and documents attesting to untrue facts and news, or to omit information in order to obtain contributions, loans, disbursements or other advantages for the benefit or in the interest of Rossi, granted for any reason by the State, a public body or by the European Union.

It is also forbidden to use contributions, financing or other disbursements, however designated, granted to Rossi by the State, a public body or the European Union for purposes other than those for which they were allocated.

It is forbidden to alter the functioning of a computer or telematic system in any way, or to illegally manipulate the data, information and programs contained therein and belonging to it in any manner, in order to gain an unfair profit to the detriment of others.

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1. The bodies belonging to Public Administration, according to the provisions of Legislative Decree no. 165/2001, should be seen to include all state administrations, including institutes and schools of all levels and grades, educational institutions, autonomous state-owned companies and administrations, regions, provinces and municipalities, mountain communities and their consortia and associations, university institutions, autonomous social housing institutes, chambers of commerce and their associations, all national, regional and local non-economic public bodies, administrations and companies, and regional health service bodies. In a broader sense, the notion of public administration, according to Opinion no. 11482/2004 of the Council of State, covers all bodies, including private suppliers entrusted with public services and associations, all national, regional and local non-economic public bodies, administrations, companies and regional health service bodies. In a broader sense, the notion of public administration, according to Opinion no. 11482/2004 of the Council of State, covers all bodies, including private suppliers entrusted with public services, public enterprises and bodies governed by public law, according to EU terminology, which are called upon to operate, with regard to the area of activity in question, within the field of a public function.



## 2.4 RELATIONS WITH THE JUDICIAL AUTHORITY

All employees and/or collaborators are required to inform the Company and the Supervisory Board of any request to make or submit statements to the Judicial Authority that may be used in criminal proceedings regarding the performance of their duties. It is forbidden to attempt any form of conditioning towards anyone, whether an employee of the company or a third party, who is called upon to make statements before the Judicial Authority that may be used in criminal proceedings, for the purpose of furthering the company's interests or otherwise gaining an advantage for it.

In particular, all Recipients are prohibited from:

- inducing anyone, through violence, threats or the offer or promise of money or other benefits, to refrain from making statements or to make false statements to the Judicial Authority, in order to favor the company's interests or to otherwise gain an advantage for it;
- accepting money or other benefits in order to make false statements or to refrain from making statements to the Judicial Authority;
- attempting to influence the behavior of individuals called upon to make statements before the Judicial Authority in any way.

## 2.5 RELATIONS WITH REPRESENTATIVES OF POLITICAL FORCES AND INTEREST GROUPS

Representatives of political forces are understood to be individuals who have institutional positions or offices within political parties or movements. Representatives of interest groups are understood to be individuals who hold institutional positions or offices within organizations such as trade associations, trade unions, environmental organizations, etc.

In their dealings with persons of these categories, no Recipient shall promise or pay sums, or promise or grant goods in kind or other benefits in a personal capacity, to promote or favor Rossi's interests, even as a result of unlawful pressure.

## 2.6 MONEY LAUNDERING, TERRORISM AND TRAFFICKING IN FIREARMS OR DRUGS

Rossi condemns all illegal activities, particularly those related to arms and drug trafficking, money laundering and terrorism, or which otherwise hinder human development and contribute to the violation of fundamental human rights.

Rossi is committed to complying with all national and international laws and regulations for the prevention of money laundering.

The Recipients shall not, in any way or under any circumstances, involve themselves in matters related to the laundering of money from criminal activities or the receiving of goods or other benefits of illicit origin.

They are also required to check the available information on potential business counterparts, suppliers, partners, collaborators and consultants in order to ascertain their respectability before establishing business relations with them. It is prohibited to use cash or other bearer financial instruments (beyond the permitted legal limits or in a manner contrary to corporate procedures) for any collection, payment, transfer of funds, investment or other use of financial assets. It is also prohibited to use current or savings accounts that are anonymous or in fictitious names.

Payments to business counterparts, suppliers, partners, collaborators and consultants must be exclusively commensurate with the service specified in the contract and may not be made to a party other than the contractual counterpart, or in a country other than that of the parties or where the contract is executed.

## 2.7 CREATING AND MAINTAINING BUSINESS, CONSULTING AND PARTNER RELATIONSHIPS

While initiating (i) business relationships with new customers and/or suppliers, (ii) consulting relationships or (iii) partnerships (e.g., joint ventures) and in the management of all active key contributors, it is prohibited, based on public information and/or that available in compliance with current regulations, to establish and maintain relationships:

- are involved in illegal activities, particularly those related to the crimes listed in Legislative Decree no. 231/2001 and, in any case, with parties lacking the necessary requirements of commercial honesty and reliability;

- hinder human development and contribute to the disrespect for human dignity and individual personality and/or the violation of fundamental human rights (e.g., exploiting child labor, facilitating migrant trafficking or sex tourism, etc.) even if indirectly;
- do not formally commit to practicing the principles contained in this Code of Ethics and in Rossi Model 231, and/or complying with current employment legislations, for example in contractual matters, including but not limited to; child labor and occupational health and safety standards; product requirements on the use of trademarks.

In order to protect the Company's image and reputation, it is essential that customer relations, including advertising campaigns, are managed with competence, helpfulness and respect, and marked by complete transparency, fairness, respect for the law and freedom from all forms of conditioning, whether internal or external.

The suppliers of products and services, and professionals who have relationships with Rossi under various capacities, must recognize and share the ethical and behavioral principles adopted in this Code.

Suppliers are selected based on protocols that govern their accreditation, require periodic acceptance reviews, and include quality control and auditing requirements and methods.

Rossi has a socially responsible procurement policy in order to promote respect for human rights and to avoid any conflict through its indirect mineral purchasing decisions and practices along the entire supply chain.

The assumption of commitments and management of relationships with current and potential suppliers of goods and/or services must be done in compliance with the provisions of this Code of Ethics regarding the prevention of conflicts of interest. Specifically, persons in charge of, and assigned to, the purchasing process:

- are required to exercise impartiality and independence in the performance of their assigned tasks and functions, operating on the basis of objective and documentable criteria;

- must remain free from personal obligations to suppliers; any personal relationships between employees and/or consultants and suppliers must be reported to the relevant management and to the Supervisory Board prior to any negotiations;
- must maintain contact and conduct negotiations with suppliers so as to create a sound basis for mutually beneficial relationships of adequate duration, in the Company's best interests;
- are strictly required to immediately inform the Supervisory Board of any attempted or actual alterations of normal business relations;
- shall not offer goods or services, particularly in the form of favors, to personnel of other companies or entities in order to obtain confidential information, or direct or indirect benefits for themselves or the Company, without prejudice to the general provisions of this Code of Ethics;
- must not accept goods or services from external or internal parties in exchange for the disclosure of confidential information, or for actions or conduct aimed at favoring such parties, even if there are no direct repercussions for the Company

## 2.8 FAIRNESS IN ADMINISTRATION

Rossi pursues its aims in compliance with the law and the Articles of Association, ensuring the proper functioning of the corporate bodies and the protection of property rights, and safeguarding the integrity of its assets.

Rossi condemns any behavior, by anyone, aimed at altering the accuracy and truthfulness of the data and information contained in financial statements, reports, or other communications required by law. Relations with the media shall be managed exclusively by the designated function. All communication interventions must be authorized in advance.

Rossi requires the Recipients of this Code of Ethics to conduct

themselves correctly and transparently in the performance of their duties, especially with regard to any request made by the Board of Directors, the other corporate bodies, the External Auditors and the Supervisory Board in the exercise of their respective institutional functions. During audits and inspections by the competent public authorities, the corporate bodies, their members, employees and collaborators must comply with the protocols and procedures that govern such situations, maintaining an attitude of maximum helpfulness and cooperation without hindering the tasks of the inspection and control bodies in any way.

Rossi acts in full compliance with competition law; the Recipients of this Code are therefore prohibited from engaging in acts and conduct detrimental to competition, including bribery of private individuals.

## 2.9 RELATIONS WITH THE AUDITING COMPANY

The auditors must have free access to the data, documents and information they need to carry out their work.

With regards to the External Auditors, in order to guarantee the utmost respect for its independence and impartiality, the Company commits to: (i) not assigning tasks other than the audit; (ii) not assigning service tasks that may impair independence and objectivity.

In addition, those involved in the audit of the financial statements in a managerial and supervisory capacity, the shareholders and directors of the assigned auditing firm, and those of the companies controlled by, or in control of the audit, may not hold corporate roles in the management and supervisory bodies of the Company that assigned the audit. Nor may they work for the Company on either a self-employed or employed basis to perform managerial functions, unless at least three years have passed since the expiration or revocation of the assignment, or since they ceased to be partners, directors or employees of the auditing firm or the companies controlled by or controlling it.

## 2.10 RELATIONS WITH THE BOARD OF AUDITORS

Statutory auditors are appointed according to a transparent process to ensure; among other things, timely and adequate information on the personal and professional qualities of candidates for the role.

It is forbidden to assign tasks other than auditing to individual members of the Board of Statutory Auditors which could impair their independence and objectivity.

The Company has put measures in place to ensure the effective performance of the duties of the Board of Statutory Auditors, with particular regard to the conduct of periodic audits, the provision of various documents and the routine and special requests for information submitted by them, through the assistance of its own internal staff, acting with the utmost transparency and propriety.

## 2.11 CONFLICT OF INTERESTS

To this end, the exchange of information between the Board of Auditors and the Supervisory Board is also encouraged.

The Recipients of the Code are required to avoid all situations and activities that could lead to a concrete conflict with the interests of the Company or may affect their ability to make impartial decisions in the Company's best interests and in full compliance with the rules of the Code of Ethics.

The Recipients of the Code must also refrain from gaining personal benefit from acts of disposal of corporate assets or business opportunities of which they have become aware in the course of their duties.

Staff in senior positions who are required to make decisions in activities where there is an obvious conflict between their personal interests and those of the Company must:

- communicate the existence and nature of the conflict to the Supervisory Board and their own superior;
- refrain from exercising their decision-making role and delegate the task to other persons in charge of the corporate organization;
- must involve other persons in the decision-making process in the event that the above refrainment/delegation is not



## 2.12 PROTECTION OF THE PERSON AND PERSONALITY RIGHTS

possible, in order to make the process more transparent.

The Company recognizes the value of dialogue and of the relationship with all of its stakeholders, particularly the community in which it directly operates.

The Company condemns any behavior detrimental to the individual personality and to the physical, cultural and moral integrity of the people with whom it deals, and is committed to combating any behavior of this nature, including the use of unreported employment.

Therefore, the Company condemns all forms of physical or psychological abuse of minors, as well as any form of child prostitution and/or pornography.

The Company also condemns slavery, the exploitation of workers and the use of child labor, and is therefore committed to not using or supporting such forms of labor.

Any form of discrimination and harassment on the grounds of race, sex, religion, age, sexual orientation, disability or other aspects of a personal nature unrelated to the work activity must be excluded from the work environment.

Rossi promotes multiculturalism and gender equality in the workplace.

The Company prohibits all conduct perpetrated with the aim of harassing employees or collaborators.

Illegal behavior and abuse of any kind in the workplace, and threats or aggression towards employees, collaborators or the Company's property and assets are prohibited. Rossi is committed to respecting the privacy of employees and collaborators by adopting methods for the processing and storage of personal and sensitive data that comply with current legislation and provide guarantees of effectiveness.

## 2.13 PROTECTION OF HUMAN RESOURCES

Human resources are recognized as a fundamental and essential factor for corporate development. The Company's principal resource is its employees. For this reason, it seeks to ensure the involvement of all its collaborators in its vision of a sustainable company based on corporate responsibility.

The Code of Ethics therefore expresses Rossi's commitment to ethical conduct towards its employees.

The Company encourages the recruitment of young people, investing in them and protecting their professional growth and development in order to increase the wealth of knowledge it possesses, in compliance with current legislation on individual personality rights and with particular regard to the moral and physical integrity of employees and collaborators. Rossi ensures equal opportunities, full integration and opportunities for growth within the company for all its workers.

Staff are selected on the basis of objective and transparent criteria and are hired exclusively under regular employment contracts. No form of irregular work is tolerated. Candidates should be made aware of all aspects of the employment relationship. Staff must be paid an adequate wage for a decent life. Employees are ensured compliance with the relevant company contractual and supplementary standards, favoring each worker's understanding of pay arrangements. Overtime work is optional and must be paid. Employees are guaranteed reasonable daily and weekly working hours, consistent with the provisions of the law and the collective bargaining agreement. The granting of salary increases or reward and incentive systems, and access to higher positions or roles (promotions) is based not only on legislation and collective bargaining agreements but also on the individual merits of employees. Rossi pledges not to foster forms of cronyism or nepotism.

The Company defines, promotes and requires training programs for all personnel based on the principles of necessity, diversification and reiteration. Training is considered part of the individual and Company growth strategy.

Rossi is committed to employing non-EU foreign nationals in its workforce provided they have a regular and valid residence

permit, or have applied for its renewal within the given legal timeframe. In particular, Rossi recognizes the following as its essential principles:

- the use of child labor is prohibited;
- the use of labor without consent, forced or captive labor, or labor in redemption for debt is absolutely prohibited;
- the use of violence, threats, corporal punishment or other forms of physical, sexual, psychological or verbal persecution is also prohibited;
- it is prohibited to require workers to deposit sums of money or to retain their original documents;
- the use of discrimination based on race, caste, origin, religion, disability, sexual orientation, politics or age in staff selection and hiring practices and towards employees is prohibited.

Rossi is committed to respecting the mental, emotional and physical integrity of its staff through the adoption of well-defined and non-arbitrary procedures for handling disciplinary issues. The Company informs all staff of the basic rules for disciplinary sanctions, not consenting in any way to the use of non-compliant sanctions or attitudes of mental or physical coercion, including verbal abuse.

The right to form or join trade union and/or collective associations is respected. The Company ensures that all staff are free to join independently chosen unions and that staff representatives are not discriminated against and can communicate freely with all employees within the Company.

## 2.14 HEALTH AND SAFETY IN THE WORKPLACE

The Company is committed to establishing and maintaining safe and healthy work environments, in compliance with applicable accident prevention regulations, and to cultivating and reinforcing a culture of occupational health and safety by increasing the awareness of risks and promoting responsible behavior by all employees. Hence, the Company is also committed to the constant improvement of health and safety conditions in the workplace, and to limiting the risks of occupational diseases and accidents, through intervention plans covering all aspects of prevention.

The Company is committed to implementing measures to prevent accidents at work and carrying out adequate occupational safety training for workers.

To this end, Rossi shall prepare the necessary measures for the protection of workers' safety and health, including occupational risk prevention, information and training activities, and the establishment of an organisational structure and necessary resources based on the following principles and criteria:

- a) elimination of risks and, where not possible, reduction of them based on the knowledge acquired through technological progress;
- b) assessment of all risks that cannot be eliminated;
- c) reduction of risks at their source;
- d) observance of ergonomic and health principles in workplaces, in the organization of work, the design of workplaces and the choice of work equipment, and in the definition of work and production methods, particularly in order to reduce the health effects of monotonous and repetitive work;
- e) replacement of hazardous conditions with non-hazardous or less hazardous alternatives;
- f) planning of appropriate measures to ensure the improvement of safety levels over time, with the adoption of codes of conduct and best practices;
- g) prioritization of collective protective measures over individual protective measures;
- h) giving workers appropriate instructions.

## 2.15 ENVIRONMENT

Rossi regards environmental protection as a fundamental value and is convinced of the compatibility between business development and respect for, and development of, the environment and the community. The goal pursued by the Company is to grow in harmony with the local area and to limit its environmental impact, in order to continuously improve the efficiency of its production activities, while investing in new technologies to decrease consumption and optimize resources.

The environmental policy has the following main objectives:

- the conservation of and the use of renewable sources for sustainable development of the business;
- the limitation of waste production, proper waste management and a reduction of waste;
- training and awareness raising at all company levels to significantly contribute to the change required to achieve tangible results.

Rossi is therefore committed to working in full compliance with current regulations and applying the best available technologies in order to promote and plan the development of its activities with the aim of enhancing natural resources and preserving the environment for future generations. In particular, it is committed to:

- a) identifying the environmental aspects and impacts of its activities, facilities and the site where it operates under normal, unusual and emergency conditions, and identifying preventive and control measures for these aspects;
- b) taking measures to limit and - if possible - eliminate the negative impact of its economic activity on the environment, not only when the risk of harmful or hazardous events is proven (preventive action), but also when it is uncertain whether or to what extent its business activity exposes the environment to risks (precautionary action);
- c) prioritizing the adoption of measures to prevent possible harm to the environment rather than waiting to repair damage that has already been done;
- d) planning careful and continuous monitoring of scientific advances and regulatory developments in the environmental field;
- e) promoting the importance of training and sharing the

principles of the code among all persons working in the company, both executives and subordinates, so that they follow the established ethical principles, particularly when decisions have to be made or implemented;

- f) raising awareness of environmental issues among employees and contractors.

## 2.16 USE AND PROTECTION OF COMPANY-OWNED ASSETS

Recipients are expected to act with due care and diligence to safeguard Company property, through responsible behavior in line with the working procedures provided to regulate its use, and by documenting its use, where appropriate.

The Recipients are responsible for the care of the resources entrusted to them and have a duty to promptly inform the relevant offices of any threats or harmful events to the Company or its property. In particular, they are required to:

- avoid improper use that may lead to undue costs, damage or reduction in efficiency, or is contrary to the Company's interest;
- carefully abide by internal policies and procedures, even if not formally decreed, in order not to compromise the functionality, protection and security of the Company's information systems, equipment and facilities;
- avoid uploading borrowed or unauthorized software to company systems, and never making unauthorized copies of licensed programs for personal, corporate or third-party use;
- avoid using company email to send messages with insulting and/or threatening content or the use of trivial language that can cause personal offense and/or damage to the Company's image;
- comply with company policies that prohibit the use of the Internet for purposes other than work activities and for visiting sites with content that is inappropriate to corporate decorum;
- avoid (i) divulging passwords or access codes in their possession for any reason, (ii) carrying out unauthorized access to the computer systems of others, and (iii) performing



actions that can destroy or damage computer systems or information in any way;

- always work in compliance with the safety regulations required by law and with internal procedures in order to prevent possible damage to property, people or the environment;
- use company property of any kind or value in compliance with the law, internal regulations and the principles of this Code of Ethics;
- use company property exclusively for purposes related to and required by work activities; the use or transfer of company property by or to third parties, even temporarily, is prohibited, unless when provided for by specific regulations or corporate agreements;
- act, in any way possible, to reduce the risk of theft, damage or other threats to assigned or provided property and resources, promptly informing the relevant departments in the event of abnormal situations.



### 3. ROSSI'S COMMITMENTS REGARDING THE DISSEMINATION, IMPLEMENTATION AND UPDATING OF THE CODE OF ETHICS

**R**ossi is committed, with regard to all those involved in the application of this Code, to:

- ensuring its timely dissemination, making it available to all and implementing appropriate training programs;
- ensuring that it is periodically reviewed and updated to reflect changing civic awareness, environmental conditions and regulations;
- preparing appropriate support tools to provide clarification on the interpretation and implementation of the provisions of the Code of Ethics;
- adopting an appropriate system of sanctions for violations;
- adopting appropriate procedures for reporting, investigating and dealing with violations;
- ensuring the anonymity of those who report potential violations, subject to legal obligations, and their professional protection;
- periodically verifying compliance with, and adherence to, the Code of Ethics.

### 3.1 REPORTING REQUIREMENTS AND REQUESTS FOR CLARIFICATION

Any behavior contrary to the spirit of the Code must be immediately reported to the Supervisory Board using the methods provided in Model 231.

Whistleblowers will be protected against any form of retaliation, discrimination or penalization; the anonymity of the reporters will also be guaranteed, without prejudice to legal obligations and the protection of the Company's rights, or those of persons accused wrongly and/or in bad faith.

The Recipients may also use the tools mentioned above, and indicated in Model 231, to request clarification of parts of the Code of Ethics and/or the Model for which they require interpretation and/or guidance.

Regarding "Whistleblowing" reports according to Legislative Decree 24/2023 (so-called Whistleblowing Decree), Rossi S.p.A. has prepared a special procedure attached to Model 231, General Part, called "Attachment 2 - Whistleblowing Procedure".

Whistleblowers will be prohibited from any form of retaliation, including discrimination or penalization.

The whistleblower's identity will remain confidential, without prejudice to legal obligations and the protection of the rights of the Company or people accused with malice or gross negligence. It should be noted that "Whistleblowing" reports are provided only for Rossi S.p.A.





## 4. DISCIPLINARY SYSTEM

**A**ny behavior contrary to the letter and spirit of the Code of Ethics will be sanctioned in a manner commensurate with the seriousness of the violations committed, in accordance with the provisions of the disciplinary system defined by the Organizational Model, of which the Code of Ethics is an integral part.

The principles expressed in this Code of Ethics are an integral part of the conditions governing employment in the Company. Any violations will result in the application of sanctions in accordance with the current system provided for employees, managers, directors and commensurate with the seriousness of the violation.

Failure to comply with the precepts contained in this Code of Ethics may result in the termination of an existing third-party relationship on the basis of an explicit contractual provision.







## 5. IMPLEMENTATION OF THE CODE OF ETHICS

Proper and effective implementation of the Code of Ethics is only possible through the commitment and cooperation of all those working on behalf of Rossi, in collaboration with the bodies responsible for the implementation and control process.

### 5.1 INTERNAL CONTROL

The task of overseeing compliance with this Code is the responsibility of the Supervisory Board, which reports to the Board of Directors and the Board of Auditors at least once a year.

### 5.2 ETHICAL TRAINING

Rossi, in accordance with the Supervisory Board, is committed to communicating the values and principles contained in the Code of Ethics to all stakeholders so that they may be implemented in corporate management.

All staff, members of corporate bodies, consultants and, more generally, all the Recipients of this Code must familiarize themselves with the Code and undertake to follow the provisions and rules contained therein.



# Rossi

Solutions for  
an evolving  
industry



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