

Code of Ethics

Edition	Description
1/2008	Document issued
1/2010	<ul style="list-style-type: none"> Copyright and intellectual property protection Child pornography website block
1/2016	<ul style="list-style-type: none"> Harassment, bullying and discrimination
1/2018	<ul style="list-style-type: none"> GDPR reference and document revision
2/2018	<ul style="list-style-type: none"> Reference to Legislative Decree 196/2003 amended by Legislative Decree 101/2018 Harmonising EU Regulation 2016/679 on the Personal Data Protection
1/2019	<ul style="list-style-type: none"> Freedom of association and collective agreement
1/2020	<ul style="list-style-type: none"> Environmental matters
1/2021	<ul style="list-style-type: none"> Occupational safety

MISSION

LANZI Srl (hereafter “LANZI” or “Company”)

- designs, manufactures and markets personal protective equipment, work clothing and accident prevention material
- designs and manufactures automated systems for the storage, distribution, collection and management of accident prevention materials, auxiliary production equipment, components and spare parts
- provides regeneration and monitoring services for accident prevention materials

Preventing accidents at work, protecting workers and ensuring their comfort has been the company mission since 1978.

The need to ensure the conformity of products and services for a wide range of customers, including large multinational companies with complex requirements, has led the Company to adopt a development model based on the systemic vision of production processes and control of the entire supply chain: from product design to the choice of raw materials, manufacturing, use and maintenance in the field, and end-of-life disposal.

Risk analysis continues to be the foundation of the technical process. To this end, LANZI uses its own exclusive Technology Laboratory, supported by accredited European Laboratories, in order to verify the performance and simulate the usage conditions of its products, developing new solutions and ensuring compliance with specifications.

In addition, ergonomic factors, guarantees of the safety of materials used, and eco-compatibility of production cycles are increasingly important final objectives in the process.

Even in “Best Cost” countries, the selection and certification of Suppliers/Partners, who are required to operate in accordance with the stipulations of international standard SA 8000, adheres to the Company’s Social Responsibility approach, whose principles impact the entire Company.

2. PURPOSE, FUNCTION AND SCOPE OF APPLICATION OF THE CODE OF ETHICS

LANZI, in order to clearly and transparently define all of its underlying principles and values in achieving its objectives, has prepared this Code of Ethics (hereafter also referred to as the “Code”) whose observance is essential for the Company’s correct operation, as well as for its reputation and company image.

The Code is a document approved by the Board of Directors which identifies the principles and fundamental behavioural canons which LANZI intends to embody and follow in the course of its business, in all its interactions with those who work with and have relations with the Company.

By adopting the most appropriate prevention and control measures, the Company has always been committed to strictly observing laws and regulations in force, at all decision-making and operational levels, as prescribed by Legislative Decree 231/01 and, more generally, according to the principles of ethics, integrity and transparency on which LANZI's reputation is based.

3. RECIPIENTS AND DISSEMINATION OF THE CODE

The "charter of values" function covered by the Code, for objective and subjective scope and prescriptive detail, is different and broader than that of the Organisation, Management and Control Model (pursuant to Legislative Decree 231/01). The following must therefore be considered as Recipients of the Code of Ethics:

- Directors, Executives and employees of LANZI, as well as all those who, in various and different capacities, have a legal relationship of para-subordination with the Company that effectively and structurally includes them in the company organisation;
- agents, representatives, partners (not formally and structurally part of the company organisation), freelancers, intermediaries, distributors, Customers, Suppliers, and, more generally, LANZI's contractual counterparts; parties who the Company expects to share and scrupulously observe the relevant principles and behavioural canons, regardless of the mandatory subjection to a regime of management and supervision and, therefore, of derivative or indirect liability.

The Code will be considered an integral part of the contract with the aforementioned parties, and will therefore be terminated if the Company becomes aware, to the extent permitted by the nature and discipline of each relationship, of non-compliant conduct. To this end, given the inapplicability of the disciplinary systems referred to in the respective Model, pertinent express termination clauses will be used, pursuant to Article 1456 of the Italian Civil Code, specifically referring to compliance with the principles, values and behavioural canons of this Code.

With regard to this Code, LANZI:

- ensures its timely dissemination within its organisation and, in any case, to all Recipients
- provides adequate supporting information
- requires all Recipients to comply with it
- expects Recipients to report any deficiencies and actively contribute to its implementation
- ensures that all updates and changes are published and, in any case, are known to Recipients

4. GUIDING PRINCIPLES

LANZI's Code of Ethics is based on and endorses the following principles:

- **legality**
business growth and development with observance to all laws and regulations in force
- **transparency**
committed to informing internal and external stakeholders about its organisational and financial situation in a transparent manner
- **integrity**
committed to ensuring that relations with third parties are underpinned by honesty, fairness, impartiality and professionalism
- **diligence**
constant investment in research and development and full compliance with international regulations to ensure products/services comply with the required safety and reliability standards
- **fairness and impartiality**
protecting the value of fair competition and refraining from conduct which would conclude business for its own benefit, in breach of competition, copyright and intellectual property laws
- **prevention of conflicts of interest**
business decisions and choices made in accordance with the best interests of the Company
- **safety and protection of the individual**
promoting respect for the physical and moral integrity of employees, investing in the protection of health and safety in the workplace and also disseminating the culture of safety by actively involving workers and their representatives
Relationships among employees based on loyalty, fairness and respect irrespective of level of responsibility, without prejudice to roles and different company functions
- **inclusion and equal opportunities**
valuing the differences between people with different cultures, perspectives and experiences, in order to acquire and mutually exchange new skills and contributions

- **protection of personal data**

adopting procedures to guarantee the confidentiality of the information in its possession and, in any case, comply with regulations on the personal data protection, with particular reference to Legislative Decree 196/2003 amended by Legislative Decree 101/2018, harmonising EU Regulation 2016/679 on Personal Data Protection

- **environmental protection**

complying with and promoting principles of environmental responsibility, precautionary principles, and environmental risk management

5. BEHAVIOURAL CANONS AND BUSINESS CONDUCT POLICIES

LANZI guarantees that its resources will be used exclusively for the pursuit of statutory purposes; in any case, the Company does not finance or otherwise support, even indirectly, companies or other for-profit entities, political parties and trade unions, except, in the latter case, for contributory collaboration prescribed by law, and restricts relations with the media exclusively to the departments and individuals delegated to that task.

LANZI organises and develops its business by requiring the Recipients of this Code to adapt their behaviour to the principles of business conduct expressed within it.

It is incumbent upon all parties to give substance to the values and principles contained in the Code, to strengthen trust, cohesion and team spirit.

a) GENERAL BEHAVIOURAL CANONS

Without prejudice to the obligation to observe laws and regulations in force, the Company actively and substantially cooperates with the Authorities, and this is also required of every Recipient in relation to its role.

All activities performed within the Company must be conducted with professional and ethical commitment. Everyone must provide professional contributions appropriate to their responsibilities within the company and must act in such a way as to protect its image.

LANZI ensures that the selection, integration, training and professional development of staff is adapted to the needs of its business. Work is organised according to principles of health and safety pursuant to the provisions of Legislative Decree 81/2008 and subsequent amendments and additions.

Recipients of the Code must operate in such a way to avoid any possible conflict of interest, including any possible involvement of personal or family interests, which may interfere with the institutional benefit of their acts and/or with the impartiality of their determinations.

The Company takes appropriate security measures to minimise, in accordance with technical progress, the risks of loss of data for which it is the Data Controller, unauthorised access or unauthorised processing. All Recipients, in the exercise of their roles and within the scope of their competences, are

responsible for applying these security measures, both with regard to IT tools and with regard to archives and paper files.

LANZI undertakes to respect the highest levels of integrity, honesty and fairness in all relationships both internally and externally, thus refraining from any form of unlawful and irregular payment.

The Company takes all precautions, mandatory and otherwise reasonably appropriate, to prevent money laundering and the creation of financial assets from illicit activities. All Recipients, in the exercise of their roles and within the scope of their competences, are responsible for the implementation and application of these precautions.

LANZI strives to safeguard and protect the environment by continuously improving its own environmental performance. It also undertakes to operate in compliance with environmental protection by assessing the environmental impact of the products/services it offers and by minimising the risks related to the activities it performs.

b) RELATIONS WITH EMPLOYEES

LANZI operates in accordance with the UN Universal Declaration of Human Rights and adopts mechanisms to combat child pornography and, more generally, to protect children. Specifically, LANZI commits to:

- prevent any discrimination based on age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs, and respect the rights of individuals, protecting their moral integrity and ensuring equal opportunities
- ensure wage conditions consistent with contractual provisions and the level of organisational responsibility
- promoting operational methods that result in organisational well-being, by encouraging work rhythms that are consistent with employees' personal and family needs
- ensure that our employees have freedom of opinion and expression as well as the right to form associations and join organisations of their choice without prior authorisation
- prevent and punish all forms of intimidation, bullying or stalking, or insulting or defamatory interpersonal attitudes which are in any way detrimental to the dignity and well-being of the individual in the working environment

LANZI undertakes to take care of its employees by encouraging their personal and professional development, with initiatives to grow their skills and expertise. All employees are guaranteed equal training and professional growth opportunities, in line with criteria based on merit and achieved results. Individuals are selected based on professionalism and skills in relation to company needs, ensuring equal opportunities and preventing any kind of discrimination or favouritism.

LANZI looks to satisfy its staff by supporting initiatives aimed at achieving a working environment founded on motivation and involvement, encouraging the acquisition of new skills and able to measure, recognise and reward the contribution of each individual and team.

c) RELATIONS WITH CUSTOMERS

Relationships with Customers are based on fully satisfying their needs with the aim of creating a solid relationship inspired by general values of fairness, honesty, efficiency and professionalism. Communications to Customers and the documentation transmitted to them are inspired by criteria of clarity and completeness, avoiding the use of misleading or incorrect information.

The Company refrains from giving or promising its Customers gifts, favours or any other benefit that goes beyond normal customs, exceeds modest values or may in any case affect their work.

In relations with Customers, the Company must in any case:

- operate within the framework of the laws and regulations in force
- always comply with the commitments and obligations undertaken
- provide accurate, complete and truthful information so as to allow the Customer to make an informed decision
- avoid arbitrary discrimination in negotiations and not misuse any contractual power that it may have to the detriment of any Customer
- apply internal procedures in order to achieve the objective of developing and maintaining positive and lasting relationships with Customers.

d) RELATIONS WITH SUPPLIERS

The choice of Suppliers and purchases of any kind are determined and carried out exclusively on the basis of objective evaluations of quality, price, delivery capacity and service appropriate to the business needs. LANZI, also in view of the fact that Suppliers play a fundamental role in improving its competitiveness, aims to establish and maintain stable, transparent and cooperative relationships with them.

The Staff and partners of the Company do not accept gifts, favours or any other benefit that goes beyond normal customs, exceeds modest values or may in any case affect their work.

The Company:

- adopts specific procedures to ensure that commercially and professionally reliable suppliers are selected and certified, paying particular attention to parties operating and residing outside the European Community.
- excludes formal or informal alliances and contractual relationships with partners who commit human rights violations
- evaluates its strategic Suppliers also on the basis of their ability to operate and manufacture according to sustainability and environmental protection principles

e) RELATIONS WITH PUBLIC OFFICIALS OR PUBLIC SERVICE REPRESENTATIVES

Undertaking commitments with Public Administration and Public Institutions is reserved exclusively for appointed and authorised departments within the Company. For this reason, documentation relating to contacts with Public Administration must be collected and stored.

LANZI, through its employees or representatives, must not promise or offer to Public Officials, public service workers or employees of Public Administration or other Public Institutions money, goods or other benefits of any kind in order to promote and further its interests.

Gifts and presents are only allowed if they are of modest value and, in any case, if they cannot be interpreted in any way as a means of receiving unlawful favours.

The Company refrains from any conduct aimed at or in any case instrumental to the fraudulent and improper obtaining of contributions, financing, grants or other disbursements from Public Institutions and Bodies and, if legitimately obtained, ensures they are used promptly and correctly.

f) TRANSPARENCY IN ACCOUNTING AND MONITORING

LANZI, in strict compliance with the laws and regulations in force at the time, strives to continuously update the administration/accounting system to ensure that a reliable and correct representation is always obtained of the management situation so as to provide the tools to identify, prevent and manage, as far as possible, financial and operational risks, including in relation to the use of public funding and correct tax management.

The accounting records and documents deriving from them are based on accurate, comprehensive and verifiable information; moreover, consistent planning and monitoring models are adopted and adapted to its accounting structure.

All Recipients of the Code are required to operate in such a way that their management situation is represented correctly and promptly, so that the administration/accounting system can achieve the purposes described above and so that the parties responsible for monitoring it can operate in full compliance with legislative provisions.

In pursuing its business, the Company ensures management choices are taken according to rigorous economic analyses and prudent risk assessments, to guarantee the optimal use of assets and resources.

6. INSPECTION AND REPORTING – SUPERVISORY BODY

Violations of the rules referred to in this Code of Ethics and the Organisation, Management and Control Model (pursuant to Legislative Decree 231/01) must be reported, in addition to their direct manager,

also to the Supervisory Body of the Company (odv@lanzigroup.com) which recognises the relevant powers, duties and duties provided for in the Model.

The Supervisory Body is entitled to receive requests for clarifications, complaints or notification of potential or current violations of this Code of Ethics. Any information obtained in this way will remain strictly confidential.

7. FINAL PROVISIONS

This Code of Ethics may be updated and changed, both with regard to new legislation and subsequent operational experience, and with regard to any changes to LANZI's organisation and/or activity.

Turin, December 2021