1. INTRODUCTION

GENNARO AURICCHIO S.P.A. (hereinafter also referred to as "the Company" or "Auricchio") recognizes the strategic value of a supply chain based on responsibility, respect for human rights, environmental protection, and integrity in business relationships. These principles form the basis of every collaboration with Suppliers and Partners, who are expected to adopt ethical and operational conduct consistent with that promoted by the Company.

Product quality and safety are ensured through constant coordination between the Purchasing Department and the Quality Department, which oversee all stages of the selection and evaluation of entities involved in the value chain.

To ensure full alignment with the company's values, Auricchio requires its business partners to review this Code of Conduct and sign it, thereby formally certifying their compliance with the provisions contained therein.

This document establishes the minimum requirements expected in the areas of social responsibility, environmental protection, and governance, drawing on key international standards, including:

- The Universal Declaration of Human Rights (UN).
- The UN Guiding Principles on Business and Human Rights.
- The UN Convention on the Rights of the Child.
- The Convention on the Elimination of All Forms of Discrimination Against Women.
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- The fundamental standards of the International Labor Organization (ILO).
- The Paris Agreement on Climate Change.
- The Ten Principles of the United Nations Global Compact.
- The Sustainable Development Goals (SDGs).
- The European Sustainability Reporting Standards (ESRS), updated in line with regulatory developments and sector-specific requirements.

The content is organized into three thematic areas - Social, Environmental, and Governance - and serves as the framework for fair, transparent, and sustainability-oriented collaboration.

I. SOCIAL AREA

GENNARO AURICCHIO S.P.A. requires its suppliers and business partners to operate in compliance with fundamental human rights, ensuring dignified, inclusive, and safe working conditions throughout the entire value chain.
Regulatory and sustainability references:

CATEGORY	DETAILS
UN Global Compact Principles	Principles: 1, 2, 3, 4, 5, 6
Sustainable Development Goals (SDGs)	SDG 1: End Poverty SDG 2: End hunger SDG 3: Good Health and Well-being SDG 5: Gender Equality SDG 8: Decent Work and Economic Growth SDG 10: Reduce Inequalities
European Sustainability Reporting Standards (ESRS)	ESRS S1: Own Workforce ESRS S2: Workers in the value chain ESRS S3: Affected Communities ESRS S4: Consumers and End Users

HUMAN RIGHTS

- Comply with the minimum requirements set forth by local regulations and nationally, regionally, and internationally recognized standards.
- Safeguard the cultural, religious, economic, and social rights of local communities, minorities, indigenous peoples, and other vulnerable groups by adapting operational practices to the specific context.
- Prevent and address all forms of abuse, sexual, verbal, physical, or psychological, within the workplace.
- Implement appropriate remedial measures in the event of violations or negative impacts.
- Prohibit the use of physical punishment, humiliating sanctions, or any form of violence.

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FORCED LABOR AND MODERN SLAVERY

- Prohibit all forms of modern slavery, forced labor, human trafficking, and compulsory labor.
- Ensure that the employment relationship is entered into voluntarily, guaranteeing workers the right to terminate the relationship with reasonable notice.

CHILD LABOR AND YOUNG EMPLOYEES

- Prohibit child labor and hire only personnel who have reached the legal working age, in accordance with applicable regulations. The minimum age must coincide with the completion of compulsory education and, in any case, must not be less than 15 years.
- Protect young people between the ages of 15 and 18 from tasks that could compromise their physical or mental health, safety, or morals, avoiding night shifts and overtime as much as possible.
- Comply with working hours and break requirements as stipulated by national regulations and international standards.

EQUITABLE TREATMENT

- Ensure that every stage of the career path, including internships, compensation, job classifications, assignments, training, and promotions, is based exclusively on skills, experience, potential, and performance.
- Ensure pay equity based on meritocratic criteria.

NON-DISCRIMINATION

- Promote equal opportunities and an inclusive work environment, combating all forms of discrimination based on ethnicity, religion, geographic origin, social background, skin color, sex, gender, sexual orientation, political views, or other personal characteristics.
- Pay particular attention to vulnerable groups, including migrants, people with disabilities, young people, older adults, women, Indigenous workers, and LGBTQIA+ individuals.

VALUING DIVERSITY

- • To promote a work environment that recognizes and values the diversity of individual experiences, skills, and contributions.

HEALTH AND SAFETY

- Ensure healthy and safe work environments for all categories of personnel, including employees, temporary workers, apprentices, and external contractors.
- Ensure access to essential resources such as drinking water, lighting, ventilation, adequate temperature, restroom facilities, and, where applicable, safe housing.
- Identify and assess health and safety risks, preventing workplace injuries and occupational illnesses.
- Actively involve management in safety management, promoting training and raising awareness among workers.
- Implement safe operating procedures, perform maintenance on equipment, and provide appropriate protective equipment.
- Collaborate with the client company and other suppliers to monitor specific indicators, manage emergencies, and adopt best practices.
- Develop and test effective emergency plans.
- Promptly report unlawful conduct or potentially hazardous situations.

EMPLOYMENT CONTRACTS

- Provide written contracts to all workers, including temporary workers, trainees, and interns, clearly stating terms, conditions, compensation, and benefits.
- Communicate this information in a format and language that are easy to understand, along with regular and transparent pay stubs.

SALARIES AND BENEFITS

- Establish wages and benefits that comply with the minimum standards set by regional, national, and international regulations.
- Ensure that salaries are at least equivalent to the minimum wages for similar jobs, sufficient to provide a decent standard of living for the worker and their family.
- Determine compensation based on skills, experience, and performance, ensuring fairness in cases of equal merit.
- Adequately compensate for overtime hours, in accordance with the law.
- Avoid wage deductions as a disciplinary measure.
- Do not require workers to pay recruitment fees or other related expenses.

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WORKING HOURS, OVERTIME, AND TIME OFF

- Comply with working hours as stipulated by national, international, and regional regulations, as well as ILO standards.
- Implement overtime policies that comply with the law, respecting established weekly and monthly limits.
- Guarantee the right to sick leave, vacation, parental leave, and other periods of absence—whether paid or unpaid—in accordance with applicable regulations.

CONFISCATION OF PASSPORTS AND DOCUMENTS

- Do not withhold, confiscate, or destroy workers' passports or identification documents, nor engage in practices that restrict their freedom of movement.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

- Respect workers' right to freedom of association and collective bargaining, guaranteeing their ability to choose their own representatives and ensuring these representatives have adequate access to the workplace.
- Provide clear and fair employment terms, drafted in the language required by local law, including fair compensation, reasonable working hours, leave, and vacation time, in a healthy environment that complies with applicable agreements.

RESPONSIBLE MANAGEMENT OF CONFLICT MINERALS

- Recognize the risks associated with the extraction and trade of minerals, which can have negative impacts on human rights, fuel conflicts, contribute to child labor, and compromise safety.
- Manage the supply chain for critical minerals with particular attention to those originating from conflict-affected or high-risk areas, by implementing a due diligence program in accordance with the OECD guidelines and the Responsible Minerals Initiative (RMI).

SOCIAL DUE DILIGENCE

- Implement human rights and labor due diligence processes to identify and assess actual or potential negative impacts along the supply chain.
- Implement corrective measures and reporting mechanisms that ensure whistleblower protection and prevent any form of retaliation.

II. ENVIRONMENTAL ISSUES

GENNARO AURICCHIO S.P.A. requires its Suppliers and Business Partners to adopt responsible environmental practices, actively contributing to the protection of ecosystems and the transition toward sustainable models of production and consumption.
Regulatory and sustainability references:

CATEGORY	DETAILS
UN Global Compact Principles	Principles: 7, 8, 9
Sustainable Development Goals (SDGs)	SDG 6: Clean Water SDG 7: Affordable and Clean Energy SDG 12: Responsible Consumption and Production SDG 13: Climate Action SDG 14: Life Below Water SDG 15: Life on Land
European Sustainability Reporting Standards (ESRS)	ESRS E1: Climate Change ESRS E2: Pollution ESRS E3: Water ESRS E4: Biodiversity and Ecosystems ESRS E5: Resource Use and the Circular Economy

ENVIRONMENTAL PROTECTION

- Ensure compliance with national and international environmental regulations by implementing an effective environmental management system based on ISO 14001 or EMAS (Eco-Management and Audit Scheme) standards.
- Minimize environmental impacts and optimize the use of natural and energy resources by establishing key performance indicators to monitor results.
- Actively participate in environmental risk assessments, following the principles of precaution and continuous improvement.
- Exceed regulatory requirements for the prevention and reduction of pollution (air, water, soil), promptly managing any incidents and restoring any damage.
- Provide, upon request, information on the environmental practices adopted, using international standards to calculate greenhouse gas emissions and resource consumption.

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- Integrate sustainability principles throughout the supply chain, improving energy efficiency and the management of raw materials and waste, in line with the client company's environmental objectives.

BIODIVERSITY AND PROTECTION OF NATURAL RESOURCES

- Actively commit to safeguarding biodiversity and ecosystems, avoiding the overexploitation of natural resources and contributing to environmental restoration and the fight against deforestation.
- Monitor the use of natural resources (raw materials, water, fuels) and, if requested, share this data with the client company, analyzing the impacts and mitigation measures.
- Adopt a mitigation approach at critical sites, following the hierarchy of avoid, minimize, restore, and offset.

CIRCULAR ECONOMY

- Promote the use and development of recyclable or renewable materials.
- Design processes and products that optimize resource use, gradually replacing non-renewable resources.
- Promote recyclable solutions to reduce waste generation and maximize material recovery, in line with the principles of the circular economy.

WASTE MANAGEMENT

- Implement a responsible waste management system, with particular attention to hazardous waste, in compliance with applicable regulations.

GHG EMISSIONS REDUCTION

- Measure and report greenhouse gas emissions according to recognized international standards.
- Provide transparent data on emissions generated by our own activities and upstream operations, upon request from the client company.
- Improve energy efficiency and increase the use of renewable energy sources, setting emission reduction targets to promote decarbonization.
- Offer, where requested, products and services produced using renewable energy, demonstrating their origin.

WATER CONSERVATION

- Manage water resources responsibly by setting consumption reduction targets and ensuring the release of water of adequate quality for the ecosystem, with particular attention to areas subject to water stress.
- Monitor and report water consumption in accordance with recognized international standards.
- Adopt solutions for the reuse of wastewater through appropriate treatment.
- Share, upon request, information on water consumption with the client company, using internationally recognized metrics.

USE OF PLASTIC

- • Promote the elimination of single-use plastics in supplies and, upon request, present roadmaps and specific objectives on this matter to the client company.

RESPONSIBLE MANAGEMENT OF HAZARDOUS MATERIALS

- Comply with regulations governing the products supplied, adopting safe, high-quality production practices capable of addressing environmental and safety issues.
- Identify and disclose hazardous chemicals in accordance with international standards, ensuring their safe handling and disposal.
- Provide adequate training to staff and suppliers on the risks associated with hazardous materials, using specific tools and documentation.

ENVIRONMENTAL DUE DILIGENCE

- Implement due diligence processes to identify and assess actual or potential negative environmental impacts throughout the supply chain.
- Implement corrective and improvement measures in accordance with international standards and the client company's expectations.

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III. GOVERNANCE AND INTEGRITY

GENNARO AURICCHIO S.P.A. requires its Suppliers and Business Partners to conduct themselves in a manner characterized by legality, transparency, and responsibility, thereby contributing to the development of ethical business relationships that comply with applicable regulations.
Regulatory and Sustainability References:

CATEGORY	DETAILS
UN Global Compact Principles	Principles: 10
Sustainable Development Goals (SDGs)	SDG 16: Peace, Justice, and Strong Institutions SDG 17: Partnerships for the Goals
European Sustainability Reporting Standards (ESRS)	ESRS G1: Business Conduct

COMPLIANCE WITH THE LAW

- • Fully comply with applicable laws and regulations at the local, regional, national, EU, and international levels, as they relate to the performance of the specific contract.
- • Where possible, refer to the most relevant international standards, depending on the specific characteristics of the agreement.

BUSINESS ETHICS

- Act with integrity, fairness, and a sense of responsibility in all business activities and in dealings with partners, public officials, and private or institutional entities.

FRAUD AND ILLEGAL ACTS

- Refrain from any involvement in fraudulent practices, embezzlement, extortion, fraudulent bankruptcy, illicit payments, or other illegal conduct.

COMBATING CORRUPTION AND BRIBERY

- Reject and prevent all forms of corruption, whether active or passive, in any context and jurisdiction, even where such practices are culturally tolerated.
- Do not offer, promise, or provide financial or material benefits to public or private officials.
- Do not accept requests for financial benefits from third parties.
- Comply with anti-money laundering and anti-illegal activity regulations.

FAIR MARKET PRACTICES AND ANTITRUST

- Operate in compliance with competition laws, ensuring transparency and fairness in business relationships.
- Refrain from agreements, practices, or arrangements with competitors, customers, or suppliers that may restrict competition, such as price-fixing or market division.
- Do not abuse any dominant market positions.

CONFLICTS OF INTEREST

- Avoid situations that could compromise the impartiality of decisions made by employees of the contracting company.
- Do not interfere with the processes for awarding contracts or subcontracts, nor request confidential information outside of official channels.
- Maintain direct relationships with the client company, avoiding intermediaries and disclosing any conflicts of interest.
- Ensure maximum transparency in information related to procurement processes, including corporate structure and operational capabilities, and avoid false or misleading communications.
- Promptly report any situation that could potentially conflict with the client company's interests.

EXPORT CONTROLS AND SANCTIONS COMPLIANCE

- Monitor developments in national and international regulations regarding sanctions, prohibitions, trade restrictions, and export controls.
- Do not engage in business with sanctioned entities and immediately inform the client company in the event of any critical issues.

DATA PROTECTION

- Protect the personal data of the client company's representatives and other involved parties.
- Implement appropriate security measures to prevent unauthorized access, loss, or improper disclosure.
- Promptly report any security breaches resulting in the loss or unauthorized disclosure of information.

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PRIVACY PROTECTION

- Handle confidential information in compliance with confidentiality regulations, applying the best practices established by the relevant jurisdictions.
- Respect the right to privacy of all parties involved, using personal data exclusively for legitimate and relevant purposes.
- Implement appropriate procedures to protect the personal data processed, whether our own or that of third parties.

INTELLECTUAL PROPERTY

- Recognize and respect the intellectual property rights of the client company and third parties, avoiding the use of counterfeit or unauthorized products.

GOVERNANCE, COMPLIANCE, AND APPROPRIATE RECORDS

- Establish a robust governance and compliance system, with policies and procedures designed to ensure transparency, accountability, and regulatory compliance.
- Obtain the necessary permits and licenses to operate, where required.
- Maintain complete and up-to-date records of business and administrative activities, in accordance with applicable regulations.
- Establish whistleblowing mechanisms that allow for the reporting of irregularities without fear of retaliation, and implement effective corrective measures.
- Require suppliers to adhere to the same principles.

2. MANAGEMENT OF REPORTS

To promote the continuous improvement of ESG performance throughout the supply chain, **GENNARO AURICCHIO S.P.A.** provides various channels for reporting irregularities, critical issues, and constructive suggestions related to the principles set forth in this Code.
Reports may concern:

- Suggestions for improvement.
- Complaints regarding social, environmental, or health and safety issues.
- Irregular situations of any kind.
- Preventive measures to be considered.
- Proposals to support social initiatives.

The available channels are:

- A dedicated platform accessible via the website **www.auricchio.it**, under the "Whistleblowing" section, which allows reports to be submitted anonymously.
- The **toll-free Number 800-846999**, which is listed both on product packaging and in the "**Customer Service**" section of the company's website (**https://www.auricchio.it/contatti/servizio-consumatori**).
- The contact form found in the same section of the website mentioned above, which allows reports to be sent directly to the relevant departments (marketing, quality, sales, etc.).
- • The email address **info@auricchio.it**, available for written communications.

To ensure effective handling, please:

- Submit clear and legible reports.
- Include all the information necessary for a proper assessment.
- Attach evidence and/or examples that help clarify the nature of the report.

Management is committed to continuously monitoring reports submitted by internal staff and external partners. Once received, reports are analyzed in consultation with the relevant department heads in order to promptly determine the most appropriate corrective actions.

3. SIGNATURE AND ADHERENCE

GENNARO AURICCHIO S.P.A. considers it essential that its Suppliers and Business Partners be aware of the company's commitment to sustainability and ESG principles. This Code of Conduct therefore serves as a fundamental tool for promoting responsible behavior aligned with the Company's values.

By signing this document, the Supplier declares its adherence to the principles and standards contained herein and commits to progressively developing its own ESG practices. The signature constitutes a self-certification of compliance with most of the provisions set forth and a commitment to continuous improvement, contributing to the creation of an ethical and sustainable supply chain.

Although not legally binding in the absence of specific legislative requirements, acceptance of the Code will be considered a significant factor in the supplier selection and evaluation processes.

GENNARO AURICCHIO S.P.A. reserves the right to conduct periodic audits and to take appropriate measures in the event of non-compliance.

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4. PRIVACY AND CONFIDENTIALITY

The Company guarantees the utmost confidentiality and protection of data and information provided by Suppliers and Business Partners. Such data will be processed exclusively for purposes related to monitoring the supply chain, in compliance with applicable regulations regarding the protection of personal data, including Regulation (EU) 2016/679 (GDPR) and applicable national provisions.

The data will not be shared with third parties, except where required by law or with the Supplier's explicit consent.

Cremona, October 7, 2025

Place and Date

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Management

GENNARO AURICCHIO S.p.A.
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C.F.: 00665810157
P. I.: 01037330195

Supplier's Signature to Acknowledge and Accept

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