



Viglioli Franco & c. srl

43123 Parma – Strada Quarta, 51/a

info@vigliolifranco.it www.vigliolifranco.it

Code of Ethics 25/03/2026

Summary

1. Objective
2. Observance of rules
3. Ethical conduct
4. The Code of Ethics recipients
5. Corruption
6. Money laundering prevention
7. Fair Competition
8. Fair employment and social interaction
9. Gender equality
10. Workers' Health and Safety
11. Suppliers
12. Supply chain
13. Creation of shared value
14. Efficient use of resources and environmental protection
15. Respect of human rights
16. Sensitive data and information protection
17. Conflict of interests
18. Protection and use of company assets
19. Incentive, implementation, supervisory and control systems
20. Reporting Management and Whistleblowing
21. Training

1. Objective

The Code of Ethics establishes general rules in terms of Compliance and ethical conduct within VIGLIOLI FRANCO & C SRL (hereinafter The Company), the general business principles, our fundamental values and our identity. It defines the standards for our conduct, and establishes the objectives for which we work and which see the valorization of the professionalism of all those who contribute daily to making the Company a unique reality in its sector: Management, Members, Employees, Collaborators, Suppliers, Customers, External Professionals. The code of conduct must be respected by the partners, management, directors, managers and all other employees, including consultants to the company in all their activities.

2. Observance of rules

Violations of the law determine the imposition, by the competent Judicial Authority, of sanctions related to the specific violation committed in the specific case and may also determine the interdiction, of the Company, in the exercise of its own activities in both the private and public sectors and expose the Company to claims for damages related to the same violations of the law, with obvious negative repercussions not only at the economic level but also at the level of image and reliability in the national and international operating market. The Company has formally adopted this Code of Ethics to clearly define the set of values that the Company itself recognizes, accepts, shares and considers fundamental to ensure the smooth functioning, reliability and reputation of the Company. The Company monitors compliance with the Code of Ethics with appropriate information, prevention, and control tools, ensuring transparency of operations and behaviors, and intervening, where appropriate, with corrective actions. The Company will not continue any relationship with those who do not intend to align themselves with the principle of legality, a fundamental value in whose full respect the Company operates

3. Ethical conduct

Ethical conduct means respecting the rules and provisions of the law. The Company is committed daily to enhancing the professionalism of all the people whose skills it uses to pursue the goal of maximum satisfaction of its Customers through the guarantee of reliability over time of the products and services provided, in strict compliance with all regulations, also and above all in terms of environment, safety and health at the workplace. The Company is committed to ensuring that its Members, Directors, Managers, Employees and Collaborators behave in an ethically correct manner in the execution and performance of all commercial and corporate activities within their jurisdiction and delegated to them. Ethical conduct also means identifying and respecting the spirit of our internal needs, avoiding any attempt to circumvent them.

VALUE OF THE PERSON: The value of the person represents a fundamental principle at the heart of the Company's daily operations. The Company is committed to using listening and dialogue as tools for continuous improvement, both with respect to customer solution proposals and with respect to enhancing the personality and expertise of its employees and collaborators.

HUMAN RIGHTS: The primary value pursued by the Society is full respect for human rights whose implementation is promoted within its sphere of influence. The Society, undertakes not to implement, even indirectly, any abuse or violation of human rights (also understood as racism, xenophobia, slavery, harassment and discrimination).

4. The Code of Ethics recipients

The subjects addressed to this code of ethics are:

- All entities operating within the Company to achieve company objectives;
- All Collaborators, External Consultants and Business Partners (including Suppliers), required to observe, in conducting business and commercial negotiations, this Code of Ethics.

5. Corruption

The Company does not tolerate corruption. Influencing adoptable decisions by public or private entities, by promising or granting benefits and utilities of any kind, is prohibited by law and is criminally sanctioned. The Company is committed to fighting against corruption and preventing any behavior that can even provide the slightest impression of corruptive action, and in this perspective

guarantees transparency in all activities and practices. Every operation and transaction is properly registered, authorized, verified and verifiable, legitimate, consistent and congruent, according to current regulations and internal procedures. The Company acts decisively wherever there is suspicion of collusion or corruption, taking all appropriate measures. Gifts, freebies and other benefits, even if only promised, to Customers, Suppliers, Administrators, Collaborators, Employees, Public Officials, or public service representatives are permitted only when they are adequately authorized and documented, of modest value, and in any case such that they cannot be interpreted by third parties as being intended to acquire any type of advantage improperly or unlawfully. In any case, gifts, tributes and other utilities must never in any way be intended or aimed at influencing or rewarding an act specific to the recipient's office. Every manager, employee or collaborator of the Company must refrain from accepting gifts or gifts exceeding normal courtesy practices, as well as from accepting, for himself or others, any other benefit or utility, even if only in the form of a promise, aimed at compromising its independence of judgment, impartiality and operational correctness. The Manager, the Employee, the Collaborator who, by virtue of carrying out the activity carried out for the Company, receives, even at his or her home, freebies or other forms of benefit or utility, contrary to what is indicated above, must take any appropriate initiative in order to refuse said freebie, benefit or utility and inform the hierarchical superior or contact for appropriate evaluations and actions. Employees are not authorized to accept any discounts, special rates, or other privileges that may be granted due to their relationship with The Company, if such privileges are intended to influence their professional decisions.

6. Money Laundering prevention

The Company is committed to the fight against money laundering and has taken the necessary precautionary measures. These measures are also aimed at adequately raising awareness among Company Employees and Collaborators so that, in the exercise of their respective duties and functions and in commercial relationships, they act in full compliance with national and supranational legislation aimed at combating money laundering.

7. Fair Competition

The Company is committed to ensuring fair competition. Customers choose the products and services offered by the Company for their quality. The Company refuses to be a party to any illegitimate, unlawful or inadmissible agreement or to any trade-restrictive or trade-disturbing understandings (for example, counterfeiting, exchange of information relevant to competition, use of supplies by Blacklisted or embargoed Suppliers).

8. Fair employment and social interaction

The Society combats all forms of illegal employment and exploitation of workers (such as child labour and trafficking and illegal immigration). Illegal employment weakens the labour market and the social security system. It jeopardises employment and prevents the creation of new jobs, adversely affecting the national economy. The violation of workers' rights, recognized by the Statute and by national and supranational legislation, can in no way be reconciled with our ethical values which are based on full and absolute respect for the said fundamental rights as well, therein including suitable working hours, fair and equitable remuneration, freedom of trade union association. The Society observes the principles of respect in mutual relations. All employees have equal opportunities when they are hired and in the further growth of their careers within the Company. Discrimination in any form is prohibited, whether based on gender, age, race, religion, political and trade union membership, language, ethnicity, sexual orientation, or health status. In particular, no one may be harassed or disadvantaged

because of their nationality, gender, sexual orientation, religious or ethical beliefs, disability or age. The Company expects all its employees to contribute to a productive work environment by treating themselves with mutual respect, tolerance and consideration. Employees are encouraged to report all events in a hostile work environment and must do so without fear of retaliation from the company.

9. Gender equality

The Company promotes gender equality throughout its various activities, from selection and hiring to contract management and corporate career paths, without discrimination of any kind and based on merit. The Company is available to favour work during the parental leave period and thereafter. The Company aims to prevent abuse and harassment within the Company.

10. Workers' Health and Safety

The personnel who contribute to the company's activity and growth are held in high regard by the management, which, to choose them, evaluates them without prejudice or discrepancies and according to equal opportunities, keeping as the only method the correspondence between the candidate's profile and that required by the company's needs. The Staff is engaged under a regular contract of employment; no form of irregular work is tolerated. Upon establishing the employment relationship, each Collaborator receives all the information relating to the tasks to be performed, working hours, regulatory and remuneration elements regulated by the CCNL industry, norms, and procedures to be adopted for their work. They also receive safety training required by current legislation and company internal regulations. The Company protects the moral integrity of collaborators and guarantees working conditions that respect the dignity of the person. It safeguards Workers from acts of psychological violence, and counteracts any discriminatory or harmful attitude or behaviour of the person and his beliefs. Sexual harassment is not permitted and behavior or speech that may disturb the person's sensitivity must be avoided. The employee who believes that he or she has been subjected to harassment or discriminated against for reasons related to age, sex, sexuality, race, health status, nationality, political opinions and religious beliefs, etc., may report the incident to the Management which will evaluate the actual violation of the Company Code of Ethics. Everyone identically is assured the same opportunities to express their professional potential. The compensation to be paid must be commensurate with the performance indicated in the contract and payments may not be made to a person other than the contractual counterparty. The company is committed to compliance with legal requirements regarding workplace safety through a correct analysis of company risks, the Company asks all employees and non-employees that they can have an influence on safety, to comply with the provisions of the internal rules on safety at the workplace (Risk Assessment Document and company regulations) and to promptly report any type of anomaly that could prejudice the health and safety of workers operating within the company's activities.

11. Suppliers

The Company uses competent, loyal Suppliers who are able to actively collaborate with internal Employees in a relationship of indispensable and mutual loyalty, transparency and collaboration. In the event that the Supplier does not carry out its business according to the principles of this code, the Company will take such action as it deems appropriate, until it precludes any other opportunities for collaboration. Relations with Suppliers are the subject of constant monitoring by the Company's directors. The conclusion of a contract with a Supplier must always be based on relationships of extreme clarity and confidentiality. The behavior of anyone who seeks to appropriate the benefits of others' collaboration by exploiting positions of strength is unethical. Discrimination in any form is prohibited for the choice of Provider, whether based on gender, age, race, religion, political and trade

union membership, language, ethnicity, sexual orientation or health status. In particular, no one may be harassed or disadvantaged because of their nationality, gender, sexual orientation, religious or ethical beliefs, disability or age.

12. Supply chain

In the context of relations with suppliers the Company requires compliance with the principles of the Company Policy and this Code of Ethics by the various suppliers at the various levels of the supply chain.

13. Creation of shared value

The Company is committed to reconciling economic objectives with social and environmental ones by generating value for the Company, for the Stakeholders and for the territories in which we operate, valuing positive externalities and avoiding or minimizing negative ones.

14. Efficient use of resources and environmental protection

The Company promotes the efficient use of energy resources and the reduction of greenhouse gas emissions, through the implementation of energy-efficient technologies and the promotion of renewable sources. We encourage our Suppliers to improve their environmental performance and, where possible, direct and support them in their improvement process.

15. Respect of human rights

The Company is committed to ensuring respect for human rights in our activities, operating within the framework of the United Nations Universal Declaration of Human Rights, and between Suppliers and business partners, contributing to the creation of a responsible supply chain. We reject any form of irregular work and promote policies aimed at the psychophysical well-being of staff.

16. Sensitive data and information protection

The Company collects and processes personal data, sensitive and otherwise, of its employees and of the natural and/or legal persons with whom it maintains relations or dealings. This processing, where provided for, is carried out with the consent of the interested parties and takes place in the manner and limits provided for by the GDPR EU Regulation 2016/679. These standards also provide for the prohibition, without prejudice to the hypotheses provided for by law, of communicating/disseminating personal data without the prior consent of the data subject and establish the rules for the control, by each collaborator, of the rules protecting privacy. The Company's employees have access to various information relating to other entities and companies. Access, use and disclosure of such information without authorization could harm the Company or the third party; employees are therefore prohibited from accessing, using or disclosing such information without due management authorization and in full compliance with the requirements provided by the third party, when the holder of such information.

17. Conflict of interests

A conflict of interest is generally any business that is or appears to be at variance with the Company's best corporate interests. Any conflict, even if only apparent, must be immediately communicated to the Directorate. Employees may not work or provide advice directly or indirectly to a competitor or engage in activities that compete with the Company's economic interests, including work for a Supplier; they may not use the Company's Customer lists or contacts to market their own or third-party goods and services, even if they are not in competition with the products or services promoted by the Company. Employees must avoid any material financial interest in the Company, where such

interest may conflict with the Company's corporate interests. They must also promptly report any situation of strong personal interest to themselves or their immediate family members.

18. Protection and use of company assets

The Company possesses both tangible and intellectual assets. Employees and Collaborators are required to protect those entrusted to them and to safeguard all others. In case of loss or risk of loss of assets of the Company, each Employee must immediately report the fact to Management. Company communication systems, including internet connections, should only be used to carry out company activities or for other instrumental purposes authorized by the respective Management, the relevant Company directive or instructions on the matter. The Employee must take care to always follow the instructions on the use of the passwords and codes assigned to him. Furthermore, the intellectual assets of the Company, which are of various kinds and include, among other things, software programs, technical documentation, and projects, must be treated with due care. The intellectual property created by the Employees in the course of their work is transferred and transferred to the Company in accordance with the laws in force and/or the respective contract of employment or other agreement, without prejudice to the exceptions provided for by international conventions, local laws or particular agreements. At the end of the employment relationship, you must return all assets owned by the Company, including documentation and media containing information from the Company. The former Employee still remains subject to restrictions on the use and disclosure of information owned by the Company.

19. Incentive, implementation, supervisory and control systems

Under the rules included in this code, everyone is accountable for their actions and conduct. Furthermore, since Company Management is responsible for directing the actions of others and is an example for Employees, they, together with Employees, Collaborators and Suppliers, must be well aware of the values expressed in this document. Training programmes and information events will provide the appropriate tools with regard to the content of the Code of Ethics and related guidelines. No one has the authority to require anyone to violate this Code of Ethics; any such attempt is subject to immediate disciplinary action. Observance of the rules of the Code of Ethics represents an essential part of employees' contractual obligations. In the event of a violation of one of the rules indicated so far, the Directorate will take the necessary measures as quickly as possible in compliance with the current laws and regulations provided for by the Sanctions System. The Employee who reports the (alleged) violations of the Code of Ethics or related guidelines must not fear retaliation for reporting, also by virtue of the legislation (Whistleblowing). The Company also implements a system to prevent reports from being merely slanderous or derogatory. Disciplinary sanctions for third parties (natural or legal persons) who have contractual relations with the Company, consist of the termination of the contractual relations in existence, without prejudice to the right to compensation for damages.

20. Reporting Management and Whistleblowing

In compliance with current legislation on Whistleblowing, any form of retaliation, discrimination, or penalties against those who make good faith reports is prohibited. The Company reserves all action against anyone who makes untrue reports in bad faith. Reports may be communicated or transmitted according to the following criteria:

- Ordinary mail destined for the Legal Office registered to:

VIGLIOLI FRANCO & C Srl Strada Quarta, 51/a – 43123 Parma

- Email to the email address: info@vigliolifranco.it
- ANAC website: <https://whistleblowing.anticorruzione.it/#/>

In case, according to the reporter, the signaling through the internal channel (1 and 2), does not lead to any results, according to the indications of Legislative Decree 24/2023 the external channel is activated (link of the ANAC website <https://whistleblowing.anticorruzione.it/#/>) where any report can be made. Reports are handled by the group composed of the Management, the Head of Administration. Without prejudice to legal obligations, the identity of the Reporter cannot be revealed, without the express consent of the same with reference to Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR).

21. Training

Training programmes and information events will provide the appropriate tools with regard to the content of the Code of Ethics