



FERRINO & C SpA CODE OF ETHICS

Summary

FERRINO – CODE OF ETHICS	1
1. GENERAL PRINCIPLES	2
Comittment to sustainable business:.....	2
2. TOP MANAGEMENT	3
3. HUMAN RESOURCES.....	3-4
Hierarchal Relationships	5-6
4. EXTERNAL RELATIONS	6
Relations with institutions.....	6
Relations with clients and suppliers.....	6
5. CONFIDENTIALITY OF INFORMATION	7
6. COMPLIANCE WITH CODE OF ETHICS.....	8

1 GENERAL PRINCIPLES

The Code of Ethics is the main tool for implementing ethics within the Company, aimed at clarifying and defining the set of principles to which its addressees are called upon to conform in their mutual relations as well as in dealing with stakeholders in relation to the Company.

The addressees of this code are all employees, directors, collaborators, suppliers and those who work in the name and on behalf of the Company. Addressees are called upon to respect the values and principles expounded in this Code and are required to protect and preserve, through their conduct, the respectability and image of FERRINO & C. SpA as well as the integrity of its economic and human assets.

In its business activities, FERRINO & C. SpA applies as an indispensable principle **compliance with the laws and regulations in force** in all the countries in which it operates. Every employee of FERRINO & C. S.p.A abides by this principle in carrying out his or her work activities. The Company requires that this commitment also applies to consultants, suppliers, customers and anyone who has relations with the Company. The Company will not initiate or continue any relationship with anyone who does not intend to align with this principle.

In carrying out business activities, senior management, representatives, employees and all those who work in the name and on behalf of FERRINO & C. SpA abide by principles of **legality, ethics** and **transparency**.

In their activities, the Company, the members of the Board of Directors, the Employees and those who work on behalf of Ferrino & C. are committed to:

- always act in accordance with applicable regulations,
- avoid situations of conflict of interest,
- ensure the confidentiality of information and the protection of intellectual and industrial property,
- maintain transparent administrative and accounting management,
- avoid any form of giving or accepting gifts or other benefits that are not of only symbolic value.

Commitment to sustainable business:

Always engaged in the production of outdoor clothing and equipment FERRINO & C SpA believes in a sustainable business, capable of creating value while respecting and protecting nature. Ferrino considers the dissemination of the culture of quality and respect for the environment as a priority objective, to be achieved and perfected with determination, in the conviction that these aspects are of fundamental importance for the process of Company growth, the development of its Personnel, Customers, Suppliers and External Collaborators.

Ferrino operates continuously in the manner prescribed by its Management System for Quality and the Environment in accordance with ISO 9001 and ISO 14001 standards. Continuously improving the management of its internal processes through the involvement and constructive collaboration of all FERRINO staff. Development of products that are increasingly sustainable and have a lower environmental impact, through targeted design and construction choices, also in keeping with the company's CSR Policy.

2. TOP MANAGEMENT

The corporate bodies of FERRINO & C. S.p.A, in the awareness of their responsibilities, are inspired by the principles contained in this Code of Ethics, carrying out their activities according to values of honesty, integrity in the pursuit of corporate objectives, loyalty, fairness, respect for people and rules, and mutual cooperation.

The commitment of the Directors and the Chair is the responsible conduct of the company, in the pursuit of value creation objectives; the commitment of the Statutory Auditors is the exact fulfillment of the functions entrusted to them by the law.

It falls on individuals to assess situations of conflict of interest or incompatibility of functions, assignments and positions outside as well as within the company. It is incumbent on each Director and Auditor and the Chair to use the utmost rigor in the appreciation of such circumstances, for the benefit of the Company's transparent and profitable relationship with those involved in the Company's activities, institutions, shareholders and users.

Members of corporate bodies are required:

- behavior inspired by autonomy and independence, providing complete and correct information,
- behavior inspired by integrity, loyalty and a sense of responsibility to society,
- assiduous and informed participation,
- role awareness,
- sharing goals and a critical spirit in order to ensure a meaningful personal contribution.

The legitimate expression of divergent positions may not be detrimental to the image, prestige and interests of the company, which it is the responsibility of top management to defend and promote.

Information received for reasons of office is considered confidential and any use of it not arising from the institutional performance of the functions to which each Director, Statutory Auditor, Managing Director or Chair is entrusted is prohibited.

The commitments of loyalty and confidentiality assumed by accepting office bind the persons of Directors, Statutory Auditors, Managing Director and Chair even after the termination of their relationship with FERRINO & C. S.p.A.

3. HUMAN RESOURCES

FERRINO & C. S.p.A. attaches the utmost importance to those who work within the Company, contributing directly to the company's development, because it is precisely through human resources that FERRINO & C. S.p.A is able to provide, develop, improve and guarantee an optimal management of its services. It is also in the Company's interest to foster the development and professional growth of each resource, also in order to increase the wealth of skills possessed by each employee or collaborator.

For Ferrino, women represent a majority share of the workforce and often hold skills that are central to the company. Attention to gender diversity and the benefit of a welcoming, enhancing, and inclusive work environment have prompted the Company to draft a Diversity and Inclusion Policy that complements this Code of Ethics.

For the integral development of its staff and, consequently, its human capital FERRINO & C. SpA:

- undertakes to achieve working conditions functional to the protection of the psycho-physical integrity and health of workers and respect for their moral personality, avoiding discrimination, unlawful conditioning and undue hardship;
- regards legislative compliance and continuous improvement as fundamental ethical principles;
- undertakes to adopt the general principles of prevention in the implementation, modification and conduct of work activities;
- adopts criteria of merit, competence and in any case strictly professional criteria for any decision regarding the employment relationship with its employees and external collaborators; discriminatory practices in the selection, recruitment, training, management, development and remuneration of personnel, as well as any form of nepotism or favoritism, are expressly prohibited. All hiring or promotion must be carried out respecting criteria of merit and competence;
- requires managers and all employees, each to the extent of his or her competence, to adopt behaviors consistent with the principles set forth in the preceding points, functional to their concrete implementation.

Without prejudice to legal and contractual requirements regarding the duties of workers, and in particular those referring to the protection of health and safety at work, professionalism, dedication, loyalty, spirit of cooperation and mutual respect are required of employees.

The dynamics that characterize the context in which the company operates require the adoption of transparent behavior. The main success factor is the professional and organizational contribution that each of the human resources engaged ensures.

Any employee or collaborator of FERRINO & C. S.p.A.:

- orients its actions to professionalism, transparency, fairness and honesty, contributing with colleagues, superiors and collaborators to the pursuit of common goals;
- imprints its activities, whatever the level of responsibility attached to the role, to the highest degree of efficiency, adhering to the operational instructions given by higher levels of hierarchy;
- adjusts its internal and external behavior to the principles and values set forth in this Code, in awareness of the responsibilities the Company requires compliance with in the course of providing work services;
- assumes, in relations with colleagues, behaviors marked by the principles of civil coexistence and full collaboration and cooperation, including through the propensity to share information useful and functional to the work of colleagues;
- regards confidentiality as a vital principle of the business.

Compliance with applicable laws and regulations is the specific obligation of each employee, who is required to report to his or her supervisor:

- any violation - carried out within the company - of laws or regulations, or of this Code;
- any incident of omission, falsification or neglect in the keeping of accounts or in the preservation of the records on which the accounting records are based;
- any irregularities or malfunctions relating to the management and the manner in which the services are provided, in the certainty that no retaliation of any kind will be carried out against them.



Employees are prohibited from:

- the pursuit of personal interests to the detriment of corporate interests;
- the exploitation of the name and reputation of FERRINO & C. S.p.A for private purposes and similarly the exploitation for personal purposes of the position held within the Company and the information acquired in the course of work performance;
- the adoption of attitudes that may compromise the company's image;
- the use of corporate assets for purposes other than their proper purpose;
- the unnecessary consumption or non-rational use of means and resources;
- dissemination to third parties or use for private or otherwise improper purposes of information and news concerning FERRINO & C. S.p.A.;
- the performance of work duties - even for free - in conflict or competition with the company.

It is their obligation to employees and collaborators to avoid even apparent situations of conflict of interest with the Company, and in any case to notify the hierarchical managers of the occurrence of such situations.

The employee shall inform the chief operating officer of any financial or non-financial interests he or she or his relatives or acquaintances or individuals with whom he or she has had relations of collaboration in any way paid, have in activities related to the office. In all the aforementioned cases, the manager will assess the advisability for the employee to refrain from participating in the relevant activity.

The employee in the performance of his duties shall ensure equal treatment among those who come into contact with the Company. He/she shall not accept or take into account recommendations or reports, however denominated, in any form whatsoever, by force or to the detriment of persons with whom he/she comes in contact by reason of his/her office.

Interruption or termination of employment with the Company, regardless of the cause, does not justify the disclosure of confidential information or the externalization of considerations that may harm the Company's image and interests.

Employees are required to use the assets made available to them in accordance with their intended use and in a manner that protects their preservation and functionality.

All employees undertake to comply with the company's personnel regulations (Training and Training Procedure and Organizational Regulations for the use of Internet network services and/or e-mail, by Ferrino & C. personnel. SpA).

Hierarchal Relations

The behavior of each manager conforms to the values of the Code of Ethics and sets an example for his or her co-workers.

Managers shall establish relationships with their employees based on mutual respect and fruitful cooperation, fostering the development of a spirit of belonging to FERRINO.O & C. S.p.A.. The motivation of employees and the dissemination of corporate values - so that they can be internalized and shared - are essential: with this in mind, there is a commitment to the implementation and maintenance of correct, valid and motivating information flows, capable of giving the employee an awareness of the contribution made to the company's activities by each of the resources involved



Each manager pays due attention to and, where possible and appropriate, follows up on suggestions or requests from his or her co-workers, with a view to total quality, encouraging motivated participation in the Company's activities.

Management is called upon to foster a positive approach to the control function, from a perspective of full cooperation consistent with that sense of belonging to the Company that is intended to be fostered among all its employees.

The system of controls contributes to improving the efficiency of business processes; therefore, it is the common goal of all levels of the organizational structure to contribute to its effective operation, primarily through timely compliance with internal procedures, so that points of responsibility can be more easily identified.

Collaborators (internal and external) are asked to abide by the principles contained in the Code.

4. EXTERNAL RELATIONS

Relations with institutions

With full respect for their respective roles and functions, FERRINO & C. S.p.A., maintains relations and relationships with state administrations, guarantor and supervisory authorities, public bodies, local authorities and administrations, and public law organizations.

Relations with the Public Administration must be marked by clarity, transparency and professionalism, recognition of respective roles and organizational structures, including for the purpose of positive confrontation aimed at substantive compliance with applicable regulations.

The relevant corporate functions shall maintain the necessary relations with institutions, which will be conducted in accordance with the General Principles of this Code of Ethics. Each of the employees is required to comply with the same principles of transparency, compliance with obligations and cooperation with the Authorities.

Relations with clients and suppliers

Fairness, professionalism, efficiency, seriousness and reliability form the basis for establishing a sound relationship also with suppliers and external collaborators, whose choice is made according to assessments based on objective reference elements. It is the obligation of the Company's employees to ensure equal opportunities for supplier companies that meet the requirements.

The selection of suppliers and the determination of purchasing conditions, must be based on an objective assessment of the quality, usefulness, price of the goods and services requested, and the counterparty's ability to provide and timely guarantee goods and services of a level appropriate to the needs of FERRINO & C. S.p.A as made explicit in the company's Code of Conduct for Suppliers.

5. CONFIDENTIALITY OF INFORMATION

Disclosure to third parties of information that is confidential and otherwise for internal use requires authorization from the manager, in accordance with company procedures.

Safeguarding the company's assets includes the safekeeping and protection of the company's tangible and intellectual assets, as well as company-owned information and data, of which employees become aware for official reasons. Due to the strategic importance of such information, it is necessary to share it properly, enabling the realization of the common objectives of the various functions, in the knowledge that unauthorized disclosure, tampering, misuse or loss may cause damage to FERRINO & C. S.p.A.

Data and information processing:

The FERRINO & C. S.p.A guarantees the processing of personal and sensitive data relating to its employees and third parties in accordance with the criteria set forth in current privacy regulations.

Employees are required to reserve to the personal data of which they become aware the most appropriate treatment to protect the legitimate expectations of those concerned regarding their confidentiality, dignity, and image. The conduct of the Company's business involves the acquisition, storage, processing, communication and circulation internally and externally of written, telematic, and/or verbal documents, studies, data and information. This information, acquired and processed by employees in the performance of their duties, must be disclosed in full compliance with the obligations of diligence and fidelity arising from the rules and contract of employment, as well as in compliance with the rules of law.

Accounting records are kept in accordance with the principles of transparency, truthfulness, and completeness of information that guide the entire information policy of FERRINO & C. S.p.A.

The Company's accounting evidence must be based on accurate, comprehensive and verifiable information.

Each entry in the books must reflect the nature of the transaction, represent its substance, and be based on adequate supporting documentation so as to allow:

- easy accounting registration;
- the identification of different levels of responsibility;
- the accurate reconstruction of the operation.

The Board of Statutory Auditors has free access to data, documentation and information useful for carrying out the control activities under their jurisdiction. All employees are required to lend their full cooperation for this purpose.



6. COMPLIANCE WITH CODE OF ETHICS

The company undertakes to promote and ensure adequate knowledge of the Code of Ethics by disseminating it to the Addressees through appropriate, effective and adequate information and communication activities.

It is specifically noted that this Code is published on the Company's website.

In addition, the Company is committed to updating the contents if needs dictated by changes in the context, reference regulations, environment or business organization make it appropriate or necessary.

The rules of conduct defined in the Code constitute a basic reference to which Addressees must adhere in their relations with stakeholders.

Violation of the principles and contents of the Code by the Addressees may constitute a breach of the obligations of the employment and/or contractual relationship, with the possibility of imposition against the perpetrators of the sanctions provided by the Company's Model, of which this Code is an integral part.

Compliance with the rules of the Code of Ethics is an essential part of the contractual obligations of Employees, Collaborators, Suppliers and all Stakeholders.

San Mauro Torinese 25th November, 2024