

COESIA CODE OF ETHICS

Ethics at work

coesia

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Message from the President

The Coesia Group places ethics at the heart of entrepreneurial business conduct and recognizes the key cultural role of corporate responsibility in fostering and enhancing social relationships.

All Companies in the Group develop their own social and environmental responsibility in their areas, in alignment with the principles and guidelines provided. With their actions, they contribute to prosperity and improve the quality of life in their communities.

First introduced in 2010, our updated Code of Ethics reflects the extant methodological approach to the well-being of the human capital employed in Coesia. It also provides a framework of positive ideas and values that serve as a support in facing the personal and social changes as well as the ecological and climate challenges of our times.

With the revised Code of Ethics, Coesia intends to continually create highly favourable conditions to foster and share a social responsibility and sustainability project within all the Group's Companies.

It is everyone's commitment to sustain and enact our shared values. In every day life, our responsibility-oriented behaviours are a sign of social maturity and reflect cultural and economic advancement.

We seek to continue to promote a work environment, where the exchange of ideas and suggestions is encouraged through an open debate regarding our work approach, corporate identity, and innovative potential.

The evolution of this new virtuous path towards an increasingly responsible Group of Companies, where our shared values can be put into practice on a day to day basis, requires a common commitment from the people and organizations we are involved with. This will allow all our Companies and communities to develop meaningful interactions that can effectively contribute to a real and more sustainable development.

Isabella Seràgnoli

Coesia's Code of Ethics



The Coesia Code of Ethics sets out the ethical principles of conduct required for those who act in the name or on behalf of Coesia. It guides the actions of all the Coesia Group Companies and indicates how to report behaviours or situations that are not in line with the Code.

¹ A *Stakeholder* is any party which, either directly or indirectly, affects or is affected by any activity of an organisation. COESIA's stakeholders are its Clients, Collaborators, the shareholder, the Board of Directors, suppliers (including suppliers of capital), labor unions, competitors, the environment and community, including end users, the university, research centres and schools, institutions, public administration and Control Bodies.

² The term *Employees* is used to refer also to all individuals who collaborate with the Companies belonging to the Coesia Group in different capacities – such as directors, outsourced workers, and consultants.



Such principles govern the relationships with all stakeholders¹, both inside and outside the Company, and reflect the commitment to adopt best practices that not only comply with the law, but are also inspired by a strong sense of ethical integrity among Employees², with clients, commercial partners, suppliers, and the community in which Coesia operates.

The principles outlined in this Code provide support in working toward the Group's mission and making good and timely decisions in the exercise of professional activity, while always protecting and constantly improving Coesia's reputation.

This second version of the Coesia Code of Ethics has been approved by the Coesia Board of Directors and applies to all Companies controlled by the Group as it is considered a fundamental element of its organisational culture.

Who is it for



The Code of Ethics applies to all members of the Boards of Directors, and other Governing and Supervisory Bodies of the Coesia Group Companies, managers and Employees under any contractual agreement, including contingent workers, partners and suppliers, as well as consultants and agents.

Corporate bodies and Company managers are bound to stand as an example of consistent adherence to the principles of the Code in their day-to-day conduct.

Any action that could potentially benefit the Group, but is in contrast with the regulations and principles outlined in the Code, is not tolerated. In particular, all addressees shall ensure that these principles are known and consistently applied in any situation involving Coesia's Companies, even indirectly.

Coesia shall make sure that this Code of Ethics is widely disseminated by promoting communication programmes and specific training activities.

Coesia's Code provides a regulatory framework for professional conduct and is supported by internal policies and management systems, guidelines and procedures, which supply more specific details on the expected behaviours.

The Code is applicable in all the countries where Coesia operates, save for different national and supranational regulations.

The Ethical Compass



The Coesia Code of Ethics provides general behavioural guidelines to encourage a correct professional conduct. However it cannot cover every issue that may arise.

Following are some questions that may help in deciding on the right course of action when uncertain about what to do in a complex situation:

Is the conduct legal?

Is it an ethical decision?

**Is it consistent with Coesia's values and its Code of Ethics?
Does it conform to the policies, guidelines and procedures of the Group?**

What are the implications of the action to be taken?

Could this conduct appear improper to another colleague or someone outside the organisation? Could it harm the Company's reputation?

Does your supervisor know and approve of this decision?



The values and guidelines set out in this Code are designed to assist individuals in making decisions that, while abiding by all applicable laws and regulations, still leave room for individual judgement.

The ethical implications of individual behaviours might not always be evident in the first instance and it is possible to be unsure on how to behave in an unusual situation, or when operating in a cultural environment where the Code's principles do not seem to be in line with the local context. In such instances, as in any partially uncertain situation, Coesia supports individual judgement that is based on the Group's values and the principles contained in this Code.

What unites us: our mission and values of Respect, Responsibility, Knowledge, Passion



Our Mission

Creating long-term sustainable economic, social and environmental value for our customers, our Employees, the shareholder and the communities in which we operate.



Our Values

Coesia recognizes ethics³ as a pillar of conduct which is grounded on the Group's core values:



Respect

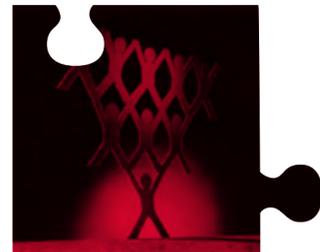
for people, rules, local communities, environmental and economic resources. Respect implies rigor and integrity.



Knowledge

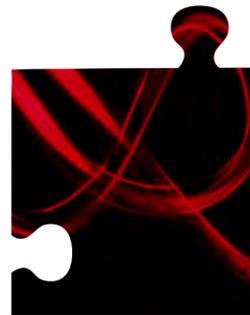
that comes from culture, the territory, relationships, experience, research and training; knowledge as personal and professional growth.

³ *Ethics* refers to a set of values and principles that guide the conduct of a person, based on which it is possible to assess one's own actions and those of others.



Responsibility

for the consequences of one's decisions and actions, to lead by example, practicing an inclusive leadership to achieve results while nurturing talent and rewarding merit. Responsibility, even collective responsibility, always starts with individual accountability.



Passion

for the product, for innovation, excellence, beauty, work and performance. Driven by passion we can envision results even before they are achieved.

Respect

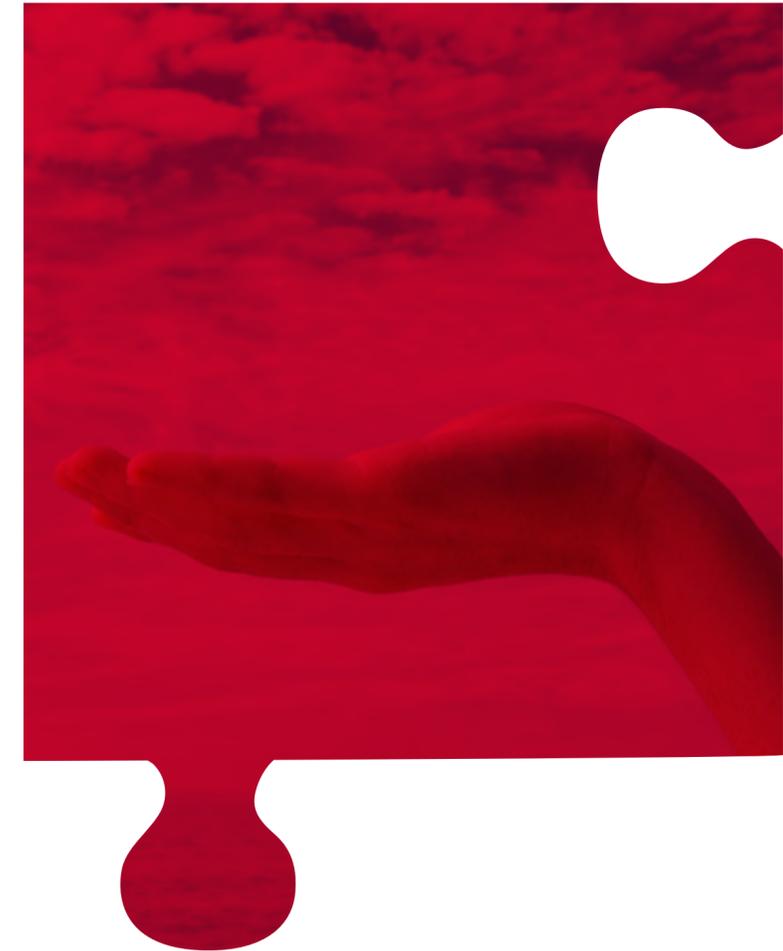
Coesia considers respect for people, their intrinsic value and dignity as a key principle of its action. Coesia acknowledges every individual who engages with its Companies and thus plays a part in building the history and future of the Group.

Coesia recognizes the value and key importance of the relations with all stakeholders and acknowledges a conduct based on ethics, integrity⁴, and respect as foundational to the success of its activity.

⁴ *Integrity* refers to an honest and fair behaviour that shows consistency with both ethical values and the law.

Coesia is committed to the highest standards of honesty and fairness, and conducts its business in strict compliance with all applicable laws and regulations in force in any country where it operates, even in different legal contexts. Full compliance with international and national laws and regulations not only means acting legally, but also recognizing the spirit of the Code's principles more broadly, for a deeper adherence to the Group's fundamental ethical values.

The rules of conduct described in the Coesia Code of Ethics aim at promoting behavioural standards for a transparent and sustainable business management, ensuring working conditions that respect human rights and local communities. They are likewise aimed at preserving and respecting environmental resources, following circularity principles.

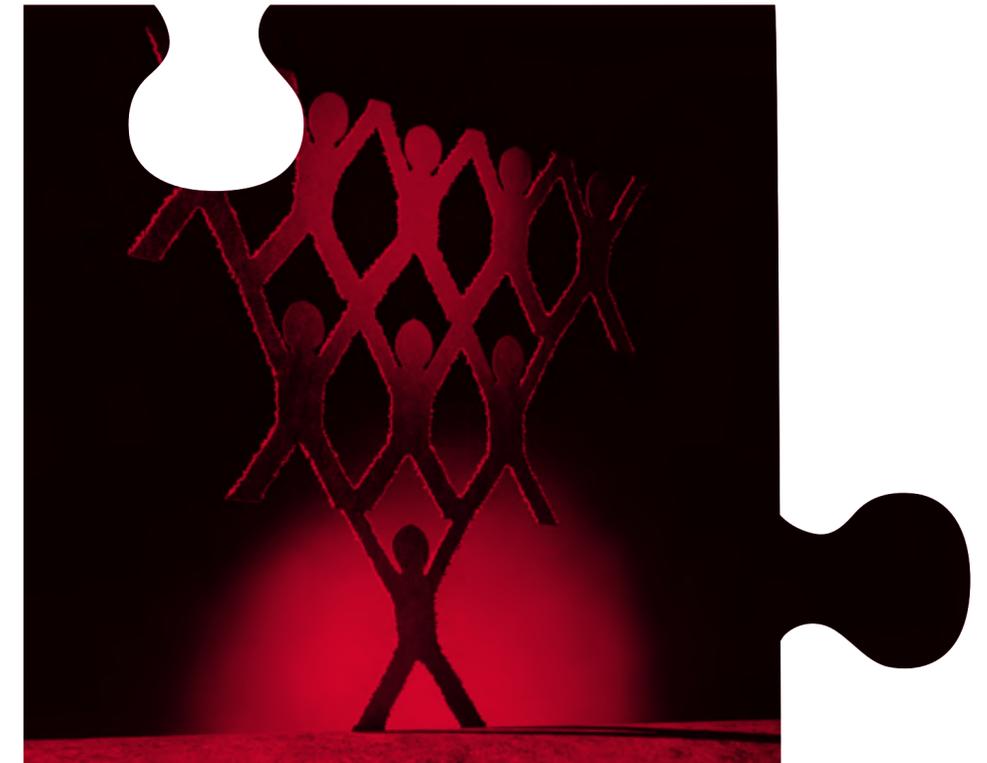


Responsibility

Coesia is committed to responsible business practices, in line with the most advanced sustainability standards, taking into account the economic, environmental, and social consequences of its actions and choices, as it is important to focus on what is done, but also on how it is done.

Coesia wishes to encourage an inclusive and conscious leadership that supports the skills and expertise of all its Employees, both individually and as a team. Everyone can exercise a servant leadership that inspires and motivates others in positive ways, in pursuit of a common goal. Dialogue, inclusion and persuasion are vital characteristics of a leadership that communicates effectively with care, transparency, and precision.

Coesia can only achieve challenging goals if everyone takes responsibility and uses their talent and creativity to partake in finding practical solutions and maintain an engaging and motivating work environment that facilitates collaboration with colleagues and among the Group's different Companies. »



Responsibility

All individuals in a position of responsibility are expected to act according to the following guidelines:

comply with the Code and transparent decision making processes, leading by example and serving as role models;

ensure that all Employees have read, understood, and are familiar with the Code;

create an environment that encourages ethical behaviour, in which Employees feel comfortable reporting any issue that might arise or asking for clarification; each manager is responsible for promoting a culture of listening and dialogue, allowing all individuals to feel free to speak up without fearing negative consequences or even retaliation;

take seriously any concern or consideration raised by an Employee and determine whether the issue should be taken to a supervisor.

Coesia safeguards and promotes the value of its Employees to improve and increase their wealth of competences, and commits to develop their skills so that they can find fulfillment in their work and in reaching the success of the Group.

Coesia values and fosters everyone's talent and provides stimulating contexts so that all can be motivated to express their full potential in the service of the Group and society. Continuous improvement and proactive behaviours are individual responsibilities which support Coesia's evolution.

All Employees are evaluated according to merit and on the basis of their skills, abilities, professional contribution and commitment.

Knowledge



Knowledge is a fundamental social value in every culture. Coesia considers it a key element for the continual evolution of the services, products and solutions offered.

Coesia aims to generate new connections between sectors, markets and technologies, as well as new relationship opportunities with its stakeholders, acting as a driving force for the economic, social, and cultural advancement of the communities in which it operates.

Coesia is aware of its impact on society and invests in research and development to offer sustainable solutions, services, and products that are in line with the ongoing digital innovation, supporting social transformation.

The knowledge, skills, and competence of the Group's Employees are unique assets and integral to Coesia's success. By promoting professional opportunities to realize personal

aspirations, Coesia facilitates the combined efforts to attain a common goal together.

Coesia invests in new knowledge and fosters the evolution and growth of its Employees by offering learning opportunities, training and the development of individual and team skills and potential, through a targeted programme for continuous improvement.

Contributing to a sustainable development also implies caring about the wellbeing of all Employees, their training and updating. Coesia values generational synergy and considers it a key factor in facing social and market challenges, so that everyone can play a significant part in the prosperity of both the Group and society.

Passion

Continuous innovation driven by our Employees' passion is crucial for progress and is integrated within increasingly hybrid models, processes, and production of excellence that hold people, technologies and sustainability together.

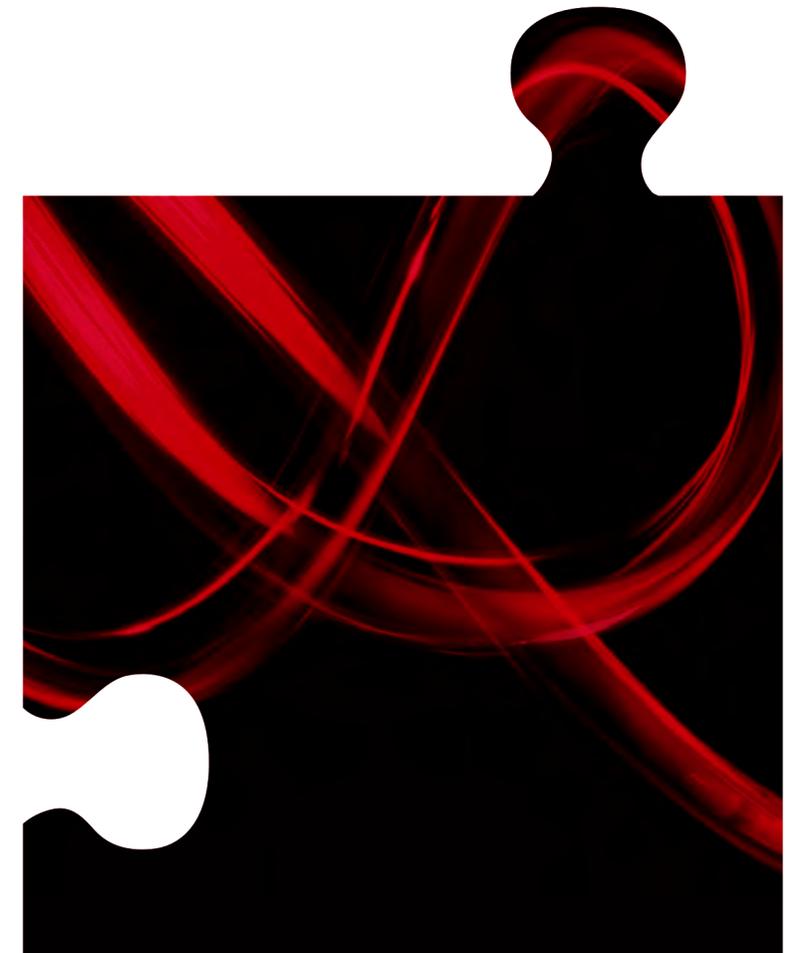
Passion generates a spiral of contagious enthusiasm that sets off multiple possibilities and increases confidence in achieving challenging goals, even in complex and highly transformational situations. With their passion, people at Coesia sustain their commitment to work and offer clients and society new solutions, services, and products.

Attention to beauty, in terms of its harmonic, functional, essential aspects, is not only limited to product solution and design, but is also applied to the workplace, the processes and quality of work, and is to be sought in all behaviours that may set an example.

Coesia ensures an inclusive and stimulating workplace where everyone can express their creativity, passion and talent, both individually and collectively.

Authentic collaboration creates a synergic and supportive environment where teamwork is fostered as a driver for multiplying possibilities and as a critical capability to sustain performance. Working as a group allows to reach together objectives that would be impossible to achieve alone.

Working with passion and accomplishing goals together generates mutual trust. Coesia expects all its Employees to proactively take part in creating and maintaining a climate of open and constructive dialogue that can increase the sense of belonging to a team.



Rules of conduct



Coesia's Companies, Employees, and suppliers commit to upholding the following rules of conduct and guidelines, to act in accordance with the Group's mission and values, alongside national and international legislations and regulations applicable in the countries in which they operate:

1. Transparent Management
2. Human and Labor Rights
3. Health and Safety
4. Inclusion: Diversity, Equal Opportunities and Treatment
5. Information and Data Protection
6. Honesty and Integrity
7. Corruption
8. Conflict of Interest
9. Confidentiality
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1. Transparent Management

Transparency reinforces the effectiveness of Coesia's values and the sense of trust and belonging to the Group.

Transparency is a keystone in advanced management and allows also to improve the Employees' perception of organisational equity.

Coesia, as a Group of Companies with a shared culture and a common goal, expects its managers to conduct work and communicate decisions to their Employees transparently, sharing clear information with the people they lead.

This kind of behaviour is also required in all cross-functional organisational relations between and within the different Group departments and Companies.



2. Human and Labor Rights

Coesia declares its commitment to respecting, safeguarding, and promoting Human and Labor Rights, adhering to the principles set out by the leading international organisations⁵ and by legal and regulatory requirements in all countries of operation.

Coesia promotes a work model that cares about and fosters the dignity and rights of all individuals, providing a healthy and safe workplace, freely chosen employment and fair pay — always respecting the legal working age and the right to join trade unions and other associations.

In case migrant workers are employed, Coesia respects the labor and immigration laws of the host country.

Coesia condemns all violations of applicable human and labor rights along the entire supply chain, in particular all forms of work exploitation, violence and harassment, and any illicit work intermediation.

⁵ · Universal Declaration of Human Rights (United Nations, 1948); · Convention on the Rights of the Child (UN, 1989); · the International Labour Organization (ILO) Conventions; · Declaration on Fundamental Principles and Rights at Work (ILO, 1998); · the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (ILO, 2017); · Norms on the Responsibilities of Transnational Corporations and other Business Enterprises with regard to Human Rights, (UN, 2003); · Guiding Principles on Business and Human Rights, (UN, 2011) · OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016).

3. Health and Safety

Coesia respects all applicable rules and regulations, adopting the highest health and safety standards to protect workers' health and wellbeing. Coesia invests in safe working environments and continually strives to uphold the best health and safety performances in the workplace.

Coesia is committed to disseminating and establishing a culture of safety and risk prevention, promoting responsible behaviours from all Employees, and suppliers, providing solutions and products in full compliance with national and international laws, as well as with the highest safety standards.

Coesia develops a culture of accident prevention and expects all Employees and suppliers to always ensure a safe and responsible conduct, to protect their own safety and that of others.



4. Inclusion: Diversity, Equal Opportunities and Treatment

Coesia acknowledges the value of dignity, diversity and the rights of all persons, and guarantees equal opportunities and treatment to all Employees, condemning any form of prejudice, discrimination⁶, abuse⁷, mobbing⁸ or harassment⁹.

Coesia respects and values diversity and ensures that no type of discrimination occurs for reasons of: national origin, language, citizenship, ethnicity, skin colour, race, gender, gender identity or gender fluidity¹⁰, gender reassignment, sexual orientation, age, professional position, religious, political or personal beliefs, union activity or involvement, physical or health condition, disabilities, marital status, pregnancy and maternity, cultural or social backgrounds.

The Group implements all necessary organisational conditions for an inclusive workplace, independently of individual differences. »

⁶ *Discrimination* refers to any unfair or less favourable treatment based on personal characteristics and includes also indirect discrimination that occurs when there is a common rule or policy that has an unfair effect on people who share a particular attribute.

⁷ *Abuse* that is verbal, physical, threatened or otherwise.

⁸ *Mobbing* involves systematic hostile behaviours targeting an employee to exclude or isolate him or her.

⁹ The term *harassment* refers to any unwanted conduct or unwelcome behaviour (verbal comments, actions or gestures) of a sexual nature or otherwise, which has the purpose or effect of undermining or violating a person's dignity, or physical and mental integrity or creating an intimidating, hostile, degrading, humiliating or offensive working environment.

¹⁰ *Gender-fluidity* refers to the freedom of defining and changing overtime one's gender expression or identity, or both, without necessarily identifying with one's own gender, or as neither female or male (gender neutral).

4. Inclusion: Diversity, Equal Opportunities and Treatment

In every aspect of the work relationship – selection, recruiting, training, compensation, promotion, professional development and work opportunities, transfer and termination – Coesia bases its decisions solely on the required qualifications, professional skills and personal inclination, merits and work performance, rejecting any form of unequal treatment.

Coesia's success is closely linked to the wellbeing of its Employees and the ability to create an inclusive and welcoming workplace. Coesia values diversity and the unique contribution of each individual, whose creativity is at the base of the leading-edge products, services, and solutions delivered by the Group.

Coesia expects its Employees to give value to the quality of relations and promote a working environment of mutual cooperation that fosters wellbeing and where everyone can feel accepted and at ease.

5. Information and Data Protection

Coesia pays special attention to the protection of its information systems and digital data and electronic records, adopting cybersecurity systems.

Data collected and stored by Coesia may include personal data that is regulated by the privacy protection legislation.

Coesia protects the personal data and privacy of its Employees, clients, suppliers, and all other parties connected with the Company, in full compliance with legal and regulatory requirements in all countries of operation.



6. Honesty and Integrity

In addition to complying with all applicable laws and regulations, all Employees are expected to adhere to the principles of the Code alongside the Company's policies, guidelines, and internal procedures. Everyone must take accountability for upholding the highest standards of honesty and integrity.

Employees are accountable for respecting and caring for the Company's resources and assets — both tangible and intangible — which must be safeguarded and properly used.

7. Corruption

Coesia does not tolerate any form of corruption¹¹, bribery¹², facilitation payments¹³ or fraud, such as accepting or requesting, offering or promising to offer, either directly or through third parties or intermediaries, any improper gain or advantage, or undertaking any action that violates or could lead to violate anti-corruption laws and regulations.

¹¹ *Corruption* means either accepting or offering money, gifts, loans, compensations, or other benefits to carry out illegal activities, violating the trust relationship with the Company.

¹² *Bribery* is the abuse of entrusted powers in order to obtain an undeserved personal benefit.

¹³ *Facilitation payments* are payments of small value provided in cash or in-kind to government officials to perform routine functions that they are otherwise obliged to perform (such as to expedite obtaining permits, licenses, etc.). Facilitation payments do not include legitimate administrative fees and legitimate payments for fast-track services that are paid to an organization (not to an individual), where a receipt may be issued on request.

Coesia is against all forms of corruption, whether direct or indirect, and sustains efforts to combat it in all countries where it operates.

Gifts or gratuities

It is not permitted to offer or accept, either directly or indirectly, any money, gift, or benefit of any kind, which could appear as a means to obtain a personal advantage, not limited to financial gains, and therefore be against the principles and rules laid out in this Code.

Business courtesies, such as gratuities or hospitality, are allowed only when of modest value and, in any case, such as not to undermine the integrity or reputation of either party involved.

Coesia protects and supports any of its Employees who refuse to pay or receive any improper transfer of value such as bribes, facilitation payments or improper gifts.





8. Conflict of Interest

Coesia expects its Employees to always act with the highest level of honesty and observe and maintain loyalty to the Company, acting in the best interest of the Group. Everyone is required to adopt a conduct that safeguards and promotes the best interests of the Company, and must avoid any situation in which their personal interests may conflict or appear to be in conflict with the interests of the Company.

Even just the appearance of a conflict of interest¹⁴ that could influence business decisions, can damage everyone’s work and reputation. Situations that may lead to any improper personal gain or benefit, for oneself or of a family member, a friend or acquaintance, as a result of their position in the Company, must be avoided.

¹⁴ Generally, a Conflict of Interest occurs when an individual’s real, potential, or perceived private interests (financial interests, or other kinds of interests, professional or personal relationships) influence or appear to influence his or her professional decisions, interfering with the interests of the Company.

Any situation of possible conflict of interest must be immediately reported via the Whistleblowing System¹⁵.

¹⁵ see p. 42

9. Confidentiality

Coesia considers all information one of the Company's strategic resources, and as such it needs to be protected and handled with all due caution. Everyone who, during the course of their work, learns reserved data¹⁶ or privileged information¹⁷ must respect confidentiality at all times.

¹⁶ *Reserved data* is any information regarding research activity and development, industrial, technical, productive, commercial or financial data, which, if disclosed outside the Company (for instance to competitors, suppliers, clients, etc.) could negatively affect the Company's interests.

¹⁷ *Privileged information* is any specific inside information concerning financial activities, which is not publicly known, and if made public, could significantly affect the value of such activities (examples of privileged information include information regarding possible acquisitions or Company divestiture).

Any form of investment, either direct or through a third party, based on confidential inside information is against the law, and therefore strictly forbidden.



10. Internal Control System, Accurate Accounting, Financial and Non-Financial Records

The efficiency and effectiveness of the Coesia Internal Control System are essential for operating the business in accordance with the rules and principles of this Code. The Coesia Internal Control System refers to a mix of activities, procedures, and organizational units that, through an integrated process of identification, measurement and monitoring of major risks, secures the following:

- the effectiveness and efficiency of business operations, thus also guaranteeing that documents and decisions are traceable;**
- making informed and responsible business choices;**
- the reliability of accounting and management information;**
- compliance with applicable laws and regulations;**
- the safeguarding of Company assets.**

For the purposes of the above the Addressees of the Code are required to contribute to the constant improvement of the Coesia Internal Control System. In carrying out their work and in connection with their separate spheres of responsibility, the Supervisory Bodies, Internal Audit, and the independent auditors have direct, full, and unlimited access to all Company personnel, activities, operations, documents, archives, and business assets.

Stakeholders rely on the transparency of books and records and Coesia commits to maintain high standards of integrity in preparing and retaining administrative, fiscal, management information systems, financial and non-financial records and statements, which shall be complete, truthful, clear, accurate, recorded in a timely manner and verifiable.

11. Legitimate Commercial and Financial Activities

Coesia conducts business in compliance with anti money-laundering¹⁸ laws, rules and regulations, in all countries in which it operates. To this end, Coesia implements traceability procedures in all transactions, and constantly ensures to not interact with suspicious interlocutors, even indirectly or in good faith.

¹⁸ *Money laundering* consists in using funds or goods that derive, either directly or indirectly, from illicit activities for legitimate operations, in order to conceal their illegal origin.

Prior to establishing relations with business counterparts, suppliers, partners, Employees, consultants, the Group shall conduct due diligence to assess their respectable reputation and legitimacy of their business, with the purpose of avoiding any implication in practices that could be associated, even potentially, with improper businesses or financial activities.



12. Fair Competition

Coesia undertakes to comply with the rules and regulations governing international trade and sanctions that may be applicable and, more specifically, respecting laws prohibiting cartels, anticompetitive agreements and abuse of dominant position.

Coesia recognizes the importance of a competitive marketplace and commits to abide by anti-trust laws, competition rules, and third-party intellectual property rights, dealing fairly with clients, suppliers, competitors, or third parties.

Coesia's Employees are aware that they should not use or transfer any information to competitors which would violate anti-trust laws.

Coesia protects all intellectual property, both its own and that of third parties, including trademarks, and implements anti-counterfeit control systems.



13. Environmental Resources

Coesia promotes a sustainable industrial development and is committed to safeguarding natural resources, mitigating the direct or indirect impact of its operations and production sites on the ecosystem. Coesia seeks to reduce the use of raw materials and natural resources, take action on climate change, preserve nature and biodiversity, and safeguard water resources.

Environmental protection goes beyond compliance with the law and all Coesia Companies facilitate the integration of environmentally sustainable practices and circularity in all stages of their production processes, collaborating with suppliers, clients, and institutions to promote the development of sustainable and advanced manufacturing models, also through digital technology.



14. Corporate Image

Coesia considers its image and reputation to be an extremely valuable resource to safeguard the Company's future. All parties addressed by this Code are responsible for maintaining and enhancing the Group's reputation with their individual behaviours at all times.

To ensure a consistent corporate image of Coesia and the Group, only the designated spokespeople are authorized to communicate with the media.

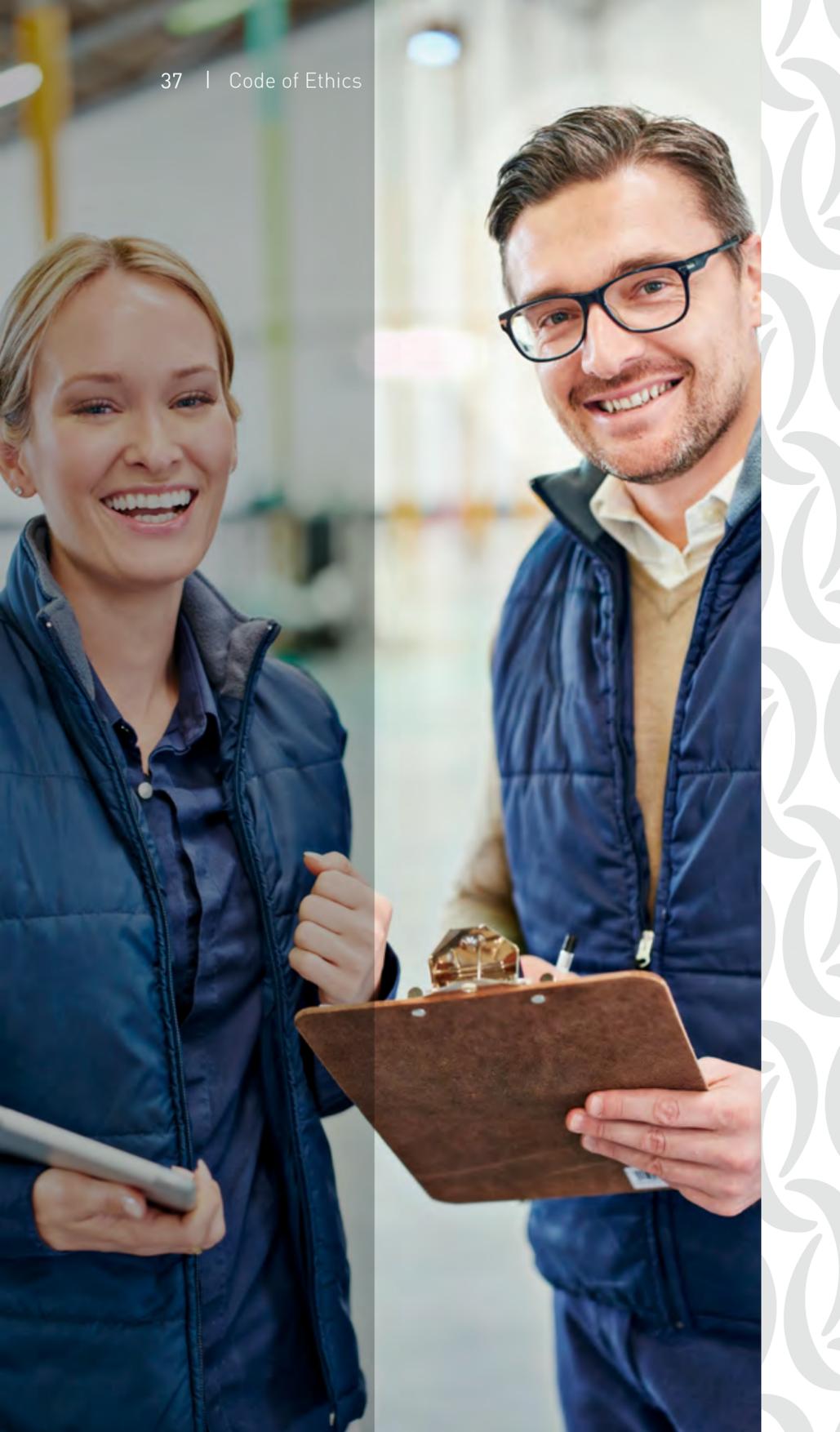
When communicating on social media, it is necessary to make a clear distinction between the free expression of personal views and those relating to one's professional role.

15. Operating as a Group

Each Company of the Group commits to uphold the principles set out in this Code, facilitating a shared business approach and culture, and supporting the synergy of opportunities between areas, markets, and clients.

Coesia conducts intra-Group operations under normal market conditions, in line with the principles of transparency and traceability, for the purpose of a fair and accurate valuation.





16. Suppliers

Suppliers are required to operate in a manner consistent with this Code of Ethics throughout the entire supply chain.

Coesia believes that securing a working partnership with its suppliers is a mutually beneficial approach to guarantee compliance with all international regulations and national laws, and ensure responsible and sustainable supply standards throughout the entire supply chain.

Coesia collaborates with its suppliers to ensure compliance with high standards in terms of integrity, product quality, health and safety of products, working environments, and people; intellectual property rights; environmental rights; human rights and the right to freely chosen work—including the freedom to join trade unions. Coesia promotes equal opportunities and treatment and does not tolerate any type of discrimination, violence, or harassment and rejects the recourse to or exploitation of child labor, forced or compulsory labor, human trafficking and any form of modern slavery.

Coesia expects its suppliers to be able to validate and document that the products or raw materials supplied throughout the entire supply chain do not originate from or finance, conflict or high risk areas connected with human rights violations.

Coesia encourages its suppliers to continually develop, implement and maintain environmentally responsible practices, improving performance while minimizing their environmental impact.

17. Community

Coesia is committed to fostering the development of the communities where it is present, respecting cultures and local traditions, through a virtuous and circular relationship.

Coesia invests in the wellbeing and growth of the communities in which it operates also through partnerships and liberal donations to institutions, schools, universities, and non-profit organisations.



The Group's Ethics Committee



There is a Group-level Ethics Committee, headed by the President of Coesia, which promotes, supervises, and monitors the implementation of the Code and the Whistleblowing System.

The Ethics Committee responds to reports of non-compliance with the Code in strict confidentiality. Throughout the entire whistleblowing mechanism, it protects the identity and privacy of the person filing the complaint, as well as that of the other subjects involved or mentioned, and all related information and data.

All information and reports submitted to the Ethics Committee will be treated confidentially and shall not be disclosed, within the limits allowed by law.

The role of the Ethics Committee is to handle reports on any significant breach of the Coesia Code of Ethics and always monitor and ensure compliance, promptly informing the Board of Directors of possible relevant violations.

Whistleblowing System





Coesia promotes a culture based on trust, dialogue, and the exchange of ideas, where Employees can voice their concerns, ask for guidance on complex decisions, address critical issues or make suggestions. An open dialogue helps to face ethical matters and make better decisions. It is always possible to find support in case of doubt and seek guidance by submitting a report.

All Employees are encouraged to express their opinions and communicate any violation, unethical behaviour, or conduct contrary to the Code of Ethics, as well as raise questions, request clarifications, or seek input to improve the decision-making process.



To facilitate evaluation of referrals, it is necessary to provide a detailed and objective description of the issue, including all known facts and information.

Anyone who reports a concern or a violation shall not be exposed to any retaliation, discrimination, or penalisation for reasons connected, either directly or indirectly, with the reporting.

In all cases, the reporting party's identity shall always be protected, unless disclosure is required by law or to protect the rights of the Group Companies, or of the people wrongly or maliciously accused.

Open dialogue: reporting channels

Reports can be sent using one of the following whistleblowing channels:

1. If the person feels comfortable, any matter can be initially reported directly to a **direct supervisor**;
2. If the claim is related to **individual or collective controversies**, the **HR Business Partner** can be notified;
3. If for some reason, the above two options are not feasible, it is possible to **report in all languages spoken within Coesia**, on strict confidential basis, using a **digital platform**:

in written form

 **coesia.ethicspoint.com**

 **coesia.navexone.eu**

or **QR Code**:



in oral form

 **toll-free numbers** are available on the portal **coesia.ethicspoint.com** (24h - 7 days a week)

(the above two channels enable anonymous reporting)

4. It is also possible to send a **signed email** or **letter in English**, under a strict confidentiality policy:

 **codethics@coesia.com**

 **Coesia, Ethics Committee, Via Battindarno 91, 40133 Bologna**

In case one feels their concern was not adequately acted upon, it might be necessary to submit the matter again through one of the other channels available.

Proposals

New ideas and proposals for improvement can also be submitted. They will be evaluated and replied to.

Requests for further information or doubts

Further information or clarifications can be requested by e-mail to: **codethics@coesia.com**

Confidentiality and Privacy

The personnel designated to collect and process the reports is obliged to maintain strict confidentiality in handling the information entrusted to them. Details of the report, which may lead to identify the reporting person, will not be disclosed without a written consent. Whistleblowers will be informed in case their complaint cannot be further investigated without their consent to disclosure.

The reporting system is managed in accordance with the privacy regulations in force.

Retaliation against the person who reports a concern or an actual, or possible, violation of the Code will not be tolerated.

