



Perletti S.p.A.

Code of Ethics

Date	Description
17/07/2025	Adoption of the Code of Ethics

1. PURPOSE OF THE CORPORATE CODE OF ETHICS

The purpose of the Code of Ethics is to achieve Corporate Social Responsibility, i.e. the ability to integrate its business activities with respect for and protection of the interests of all stakeholders (internal and external), all partners and all individuals with whom it interacts, with the protection of environmental resources and their conservation for future generations.

2. PURPOSES AND RECIPIENTS

The purpose of this Code of Ethics is to define and formalize the ethical values in which Perletti S.p.A. recognizes itself, so that these values constitute the basic element of the corporate culture, as well as the standard of conduct of anyone who operates in the interest or to the advantage of Perletti S.p.A. itself in the conduct of corporate activities and affairs.

The purpose of this Code of Ethics is to make the values, principles and behaviors in which Perletti S.p.A. recognizes itself uniform, compliant and known, at all levels of the corporate organization.

The Recipients of this Code of Ethics are the management of Perletti S.p.A. and those who represent it, all employees, self-employed collaborators who work in the absence of a relationship of subordination, suppliers and customers of Perletti S.p.A., as well as all those who, directly or indirectly, permanently or temporarily, establish employment or business relationships with Perletti S.p.A., or work to pursue its objectives.

3. STRUCTURE OF THE CODE OF ETHICS

The Code of Ethics consists of the following parts:

- the Ethical Principles of Perletti S.p.A.;
- the declination of the Ethical Principles towards internal stakeholders;
- the declination of the Ethical Principles towards external stakeholders;
- compliance with the Ethical Principles.

4. THE ETHICAL PRINCIPLES OF PERLETTI S.p.A.

4.1 Legality

The Recipients are required to comply with the laws, rules and regulations in force in the countries in which they operate, as well as with internal company regulations. Perletti S.p.A. aims to reconcile the search for competitiveness on the market with compliance with competition regulations and to promote, with a view to sustainability, social responsibility and environmental protection throughout the supply chain.

4.2 Integrity, Fairness, and Consistency

The relationships maintained with all the Recipients of the Code of Ethics must be based on the principles of honesty, fairness, integrity, transparency and mutual respect. The Recipients are required to comply with the ethical and professional rules applicable to activities carried out in the interest or to the advantage of Perletti S.p.A. The Recipients are also required to comply with company regulations.

4.3 Loyalty and Fidelity

Perletti S.p.A. undertakes to maintain a relationship of trust, loyalty and mutual fidelity with all Recipients. The relations between the Recipients and Perletti S.p.A. must be based on good faith and the utmost loyalty, which consists in fidelity to one's word and agreements, in acting with a sense of responsibility, in the enhancement and protection of the company's assets.

4.4 Confidentiality

The Recipients ensure the utmost confidentiality with regard to information known during the activities carried out on behalf of, in the interest or to the advantage of Perletti S.p.A. and its Partners, as well as information known during the activities carried out at the customer's premises. The Recipients are required to process confidential data and information exclusively within the scope of their work and for the purposes of their work activities and not to disclose them without the explicit consent of the data subjects and without the authorization of Perletti S.p.A.

By way of example and not limited to, the following are considered confidential information: work projects, commercial, industrial and strategic plans, business plans, legal information, information regarding know-how and technological processes, financial transactions, operational strategies, investment and divestment strategies, operating results, personal data of employees and customer lists, suppliers, collaborators and partners.

All Recipients are required to:

- refrain from disclosing to the outside world any information concerning Perletti S.p.A., its Partners and customers, which is not in the public domain, both during and after the termination of the employment relationship;
- always take all necessary precautions to prevent the disclosure of confidential information;
- diligently guard confidential information and adequately protect the devices that contain it;
- formally require external recipients of business information considered confidential to respect the confidentiality of the information;
- avoid and prevent any use, disclosure or communication of confidential information without specific authorization.

4.5 Respect for the person

The Recipients ensure respect for the Person, recognizing the value of life, health and human dignity. In both internal and external relations, conduct with discriminatory content based on political or trade union opinions, religion, race, nationality, age, sex and sexual orientation, state of health or any other intimate characteristic of the person in general is prohibited. Perletti S.p.A. aims to maintain and encourage a positive work environment, inspired by the protection of the freedom, dignity and inviolability of the person, as well as by principles of fairness in interpersonal relationships, which allow all employees and collaborators to carry out their work in the best possible way without any discrimination.

It is forbidden:

- engage in conduct that may create an intimidating or offensive climate towards colleagues or collaborators;
- behaving in a way that may harm the sensibilities of others;
- implement retaliatory actions against any employee who in good faith opposes or denounces any cases of discrimination, harassment or offense to the person;
- Abuse your authority against any colleague or collaborator.

4.6 Responsibility to the community

Perletti S.p.A., aware of its social role in the area of reference, on economic and social development and on the general well-being of the community, intends to operate in respect of local and national communities, supporting initiatives of cultural and social value.

4.7 Promotion of Diversity and Inclusion

Perletti S.p.A. recognizes the value of cultural, generational, gender, sexual orientation, ability and background diversity as a strategic resource and lever for innovation.

The company is committed to:

- Ensure equal opportunities at every stage of the work cycle;
- Promote inclusive and respectful language in internal and external communications;
- To combat any form of implicit prejudice or indirect discrimination;
- Monitor the inclusive climate through surveys and corrective actions.

5. THE DECLINATION OF ETHICAL PRINCIPLES TOWARDS INTERNAL STAKEHOLDERS

5.1 Transparency of corporate accounting

Perletti S.p.A. promotes maximum transparency, reliability and integrity of information relating to corporate accounting. Every operation and transaction must be correctly recorded, authorized, verifiable, legitimate, consistent and congruous. All actions and operations of Perletti S.p.A. must have an adequate record and it must be possible to verify the decision-making, authorization and execution process.

For each operation there must be adequate documentary support in order to be able to proceed, at any time, to carry out checks that certify the characteristics and reasons of the operation and identify who authorized, carried out, registered and verified the operation itself.

All Recipients are required to ensure that the management facts are represented correctly and promptly, so that the administrative-accounting system can achieve the purposes described above.

It is not permitted to display in the financial statements, reports and other corporate communications required by law as well as in the Social Report prepared for the purposes of transparency of the Benefit Company material facts that do not correspond to the truth and to omit information whose communication is required by law on the economic, equity, financial or social responsibility situation of Perletti S.p.A.

5.2 Protection of company assets

Employees and collaborators are responsible for protecting the company assets assigned to them and must work diligently to protect them, through responsible behavior and in line with company procedures.

It is absolutely forbidden for employees and collaborators to make or allow others to misuse company assets and resources.

Each employee and collaborator must:

- to use the assets entrusted to him with scrupulousness and diligence;
- avoid improper use of company assets that may cause inefficiency or prejudice to the company's interest.

Perletti S.p.A. ensures maximum availability, safety, integrity and efficiency of this category of goods.

Perletti S.p.A. employees and collaborators are required, during working hours, to use the IT tools at their disposal exclusively for business purposes and never for private and/or personal reasons, in compliance with current regulations and company procedures.

Perletti S.p.A. also condemns all unlawful conduct in relation to computer systems, including the use of unauthorized or unlicensed software, falsity in public or private computer documents, abusive access to a computer or telematic system, the possession or abusive dissemination of access codes to computer or telematic systems, the unlawful interception, impediment or interruption of computer or telematic communications, etc.

5.3 Selection and recruitment of personnel

The Recipients promote respect for the principles of equality and equal opportunities in personnel selection activities, rejecting any form of favouritism.

In the selection of the profiles of its collaborators, skills and competencies such as the following are of particular importance for Perletti S.p.A.:

- The ability to independently manage one's own task to achieve a common goal;
- The aptitude for problem solving and the propensity for critical review of the activities that make it possible to constantly improve results;
- The ability to relate and work as a team to find improvement solutions and achieve the success of the entire company;

The Recipients encourage maximum collaboration, transparency and an adequate period of support for the new employee, so that the latter is clearly aware of the task assigned to him.

5.4 Formalization of the employment relationship

All staff must be hired with a regular employment contract in compliance with the CCNL, applicable job classification. Perletti S.p.A. prohibits any form of irregular work.

Perletti S.p.A. remunerates its employees and collaborators on the basis of professionalism, role and results achieved, with the aim of maintaining a competitive environment in constant comparison with the market in which it operates.

The determination and increases of remuneration take place in compliance with ethical principles and the legal and contractual regulations in force, with clear, fair methods communicated to workers based on meritocratic principles.

5.5 Professional growth

Perletti S.p.A. promotes the professional growth of employees and collaborators.

Perletti S.p.A.'s human resources management and development system is based on continuous improvement and professional growth, promoting the updating and continuous training of employees and collaborators through specific training courses defined each year.

5.6 Internal Communication

Perletti S.p.A. considers internal communication and the exchange of information and experience to be essential elements for the effective functioning of the company.

Internal communication is the primary and direct responsibility of each employee and collaborator in the context of a correct management of interpersonal relationships with the entire group and with partners.

5.7 Health and Safety in the workplace

Perletti S.p.A. promotes working conditions that protect the psycho-physical integrity of the people who work in the workplace, providing workplaces, plants, equipment, personal protective equipment that comply with current health and safety regulations.

5.8 Criteria of conduct towards collaborators and partners

Perletti S.p.A. guarantees loyalty, transparency and professionalism towards collaborators and partners, in order to build stable relationships of value, not only from a business perspective, but also with a view to joint growth, sharing of value and ethical principles.

Perletti S.p.A. guarantees the utmost confidentiality of the information learned during the performance of the various professional activities towards collaborators and partners.

Specific clauses will be included in contracts with collaborators and partners that provide Perletti S.p.A. with the right to adopt any appropriate measure in the event that the provisions of the law, the contract or this Code of Ethics are violated.

6. THE DECLINATION OF ETHICAL PRINCIPLES TOWARDS EXTERNAL STAKEHOLDERS

6.1 Code of Conduct for Customers and Distributors

Relationships with customers must be based on loyalty, legality and transparency, as well as courtesy and professionalism. The Recipients act by guaranteeing professionalism and quality of work, ensuring continuous improvement, also thanks to the constant updating of collaborators and professionals used by Perletti S.p.A. in order to offer the customer satisfactory answers and encourage informed choices, with a view to making them an integral part of the value chain and its ethical supply chain.

It is the responsibility of the Recipients to provide information and answers that are as timely, clear, complete and understandable as possible to the interlocutor.

Furthermore, in the execution of services to the customer, Perletti S.p.A. always guarantees the legality and sustainability of the proposed solutions.

Any form of discrimination against customers is prohibited.

Perletti S.p.A. guarantees the utmost confidentiality of the information learned during the performance of projects and commercial relations with customers.

6.2 Code of Conduct for Suppliers and Consultants

The processes of selection, qualification and choice of suppliers are based on principles of legality, fairness and transparency.

The choice of the supplier is based on objective and impartial criteria in terms of quality, innovative level, cost, additional services with respect to the services/products offered.

All suppliers are required to:

1. comply with labor laws and regulations and adopt all the most appropriate measures to contribute to respect the planet and pursue sustainable innovation;
2. not discriminate against its personnel on the basis of race, nationality, sex and religion;
3. not to resort, in the performance of their activity, to the exploitation of child labor or non-consenting prisoners (forced labor);
4. read the Code of Ethics and undertake to comply with it.

Perletti S.p.A. undertakes to promote commercial exchanges with suppliers who:

5. adopt a consistent Code of Ethics and compatible with that of Perletti S.p.A.;
6. have ISO 9001, ISO 14001, ISO 45001, ISO 26000 certified management systems.

6.3 Code of Conduct towards the Public Administration and Public Institutions

In their relations with the Public Administration and Public Institutions, the Recipients promote lawful and correct relationships within the framework of maximum transparency and refuse any form of promise or offer of payments or goods to promote or favour any interest or advantage.

Perletti S.p.A. condemns all corruption and undertakes to adopt all the most appropriate measures to prevent and avoid the commission of crimes against the Public Administration referred to in Legislative Decree 231/01.

Recipients are not allowed to offer money or gifts to managers, officials or employees of the Public Administration and Public Institutions, or to their relatives, except in the case of gifts or utilities of modest value.

Negotiation and negotiation with the Public Administration is reserved exclusively for the resources authorized for this purpose, in compliance with the strictest compliance with the applicable laws and regulations, with abstention from any form of pressure – explicit or not – aimed at obtaining undue advantages, also in order not to compromise the integrity and reputation of Perletti S.p.A.

The documentation produced as a result of business relationships with the Public Administration must be kept and appropriately archived in accordance with the law.

6.4 Competition and intellectual property

Perletti S.p.A. refrains from anti-competitive conduct and complies with the rules for the protection of competition and the market.

For the purposes of this Code of Ethics, anti-competitive conduct is understood to be any misleading, fraudulent or unfair conduct that is contrary to free competition or otherwise detrimental to the rules of good faith and fairness in legal relations. In the context of fair competition, Perletti S.p.A. respects the intellectual property rights of third parties; therefore, the Recipients are prohibited from infringing these rights (trademarks, designs and models, patents, copyrights) or acts of unfair competition.

Perletti S.p.A. requires the commitment of all Recipients to protect the company's trademarks, registered or not, which represent an invaluable asset for Perletti S.p.A. and for business continuity, as well as all other intellectual property rights.

6.5 Gifts and Benefits

It is not permitted to offer/receive, directly or indirectly, money, gifts, or benefits of any kind in a personal capacity to/from managers, officers or employees of customers, partners, suppliers, Public Administration Bodies, Public Institutions or other Organizations in order to derive undue advantages and influence the recipient's autonomy of judgment, or aimed at acquiring preferential treatment in the performance of any activity related to Perletti S.p.A. .

The above cannot be circumvented by resorting to the intermediation of third parties.

6.6 Environmental protection

Perletti S.p.A. recognizes environmental protection as a primary and essential value in the operation of the company, starting from the management of daily activities to strategic choices. Investment and business choices are therefore based on respect for the environment and the regulations put in place to protect it.

6.7 Business Impact Assessment and Sustainability Report

Perletti S.p.A. communicates to its stakeholders the impact it generates through its work activities.

Perletti S.p.A. considers itself as a model to follow in the adoption and dissemination of Corporate Responsibility values – a clear expression of the principles of integrity and consistency – and has decided to do so by using the Business Impact Assessment and a sustainability report that is published every year on its website as an information tool.

The report reports on economic, environmental and social issues identified as relevant for Perletti S.p.A. and its stakeholders and represents a substantial addition to the Statutory Financial Statements.

7. RESPECT FOR ETHICAL PRINCIPLES

7.1 Duties of corporate management

Those who are part of the company's management are required to be aware of the rules contained in this Code and the reference rules governing the activity carried out within the scope of their function, deriving from the law or from internal procedures and regulations, and accepting the commitments deriving from this Code of Ethics.

They are required to behave in such a way as to set an example for the employees and collaborators of Perletti S.p.A. and to direct them in such a way that they perceive compliance with the Code of Ethics as an essential part of the quality of the work performed.

They are required to ensure that employees and collaborators comply with the obligations, adopting the necessary measures and controls to this end. Checks are also carried out directly and with periodicity appropriate to the type of activity to be verified.

The company's management actively collaborates in any control carried out by the administration, administrative authorities or judicial authorities and adopts any necessary measures to put an end to violations of the Code, having the right to resort to the disciplinary measures provided for by law in compliance with the rights, including trade union rights, of workers.

7.2 Employees

Compliance with the Code of Ethics by employees integrates and explains the obligations of loyalty, loyalty and fairness and confidentiality in the execution of the employment contract in good faith and is required by Perletti S.p.A. also pursuant to and for the purposes of Article 2104 of the Civil Code.

All recipients therefore undertake to:

1. act in line with the provisions of the Code of Ethics;
2. report all violations of the Code of Ethics as soon as they become aware of them;
3. adequately inform third parties about the obligations imposed by the Code of Ethics, require compliance with them and take appropriate initiatives in the event of non-compliance.

7.3 Third Parties

Compliance with the Code of Ethics by Perletti S.p.A.'s suppliers, collaborators and partners integrate the obligations to fulfil the duties of diligence and good faith in the negotiations and execution of the contracts in place with Perletti S.p.A.

Violation of the rules of the Code of Ethics and the Protocols and Procedures referred to in the contract may constitute, depending on the right gravity, cause for withdrawal or termination of contracts with any legal consequences, including compensation for damages.

7.4 Dissemination and training

Perletti S.p.A. undertakes to adequately disseminate the content of this Code and the principles that inspire it among employees, collaborators and partners through publication on the company website, through delivery of the same or through the company intranet.

Perletti S.p.A. undertakes to ensure that every employee, collaborator, partner – and in general all Recipients – receives adequate information and training in relation to the contents of the Code, as well as the company rules and procedures, and the related sanctioning measures in the event of violation of the same, on the basis of applicable national regulations.

7.5 Guidelines of the sanctioning system

Violation of the principles set out in this Code compromises the relationship of trust between Perletti S.p.A. and its stakeholders.

Violation of the rules of the Code means the proposal of actions or behaviors that do not comply with the provisions of the Code itself, or the omission of actions or behaviors prescribed therein. The violation may constitute a breach of the obligations of the employment relationship, with all the consequences provided for by the regulations in force and by collective agreements, where present, also with regard to the maintenance of the employment relationship and may also result in compensation for damage arising to Perletti S.p.A.

The types of sanctions are provided for by the regulations or collective bargaining in force. They will be proportionate to the gravity of the violation and never harm the dignity of the human person. The sanction is imposed by the competent company function.

As for non-compliance with the provisions of this Code of Ethics by consultants, partners, collaborators in general, suppliers of goods or services, the relevant sanctioning provisions will be contained in the respective contractual agreements that determine the conditions of the relationship.

7.6 Reporting system and whistleblower protection

Perletti S.p.A. adopts an internal reporting system to allow employees, collaborators and third parties to report violations (including suspected ones) of the Code of Ethics, national or European Union regulations, anonymously and protected.

The system guarantees:

- confidentiality of the identity of the whistleblower;
- absence of retaliation or discrimination against him;
- traceability of reports and management in accordance with the principles of impartiality, timeliness and protection.

The reporting methods and the channel references (platform, ethical contact person, etc.) are published on the company website and on the intranet.

8. UPDATING OF THE CODE OF ETHICS

This Code of Ethics is subject to review at least every two years, or whenever there are significant changes in applicable legislation, corporate values or organizational structure.

The Management, with the support of an ethics committee (where established), takes care of the updating process, involving representatives of strategic corporate functions.

9. FREQUENTLY ASKED QUESTIONS (FAQ)

Q: I have a doubt as to whether a certain action may be contrary to the Code of Ethics. What should I do?

If in doubt:

- Refer to the general principles of the Code (integrity, transparency, compliance with laws).
- Talk to your direct manager or the Ethics Office, if there are any.

If you are still unsure, please use the contact details below to ask for clarification anonymously or in person.

Q: I have witnessed behavior that I believe does not comply with the Code of Ethics. What should I do?

You have several options:

- Talk to your manager if you feel comfortable.
- Use the internal reporting channel (segnalazioni@perletti.com).
- You can also submit a report anonymously.

All reports are treated confidentially and without risk of retaliation.

If I report misbehavior, what are the consequences?

The report will be:

- Received and evaluated by a relevant body (Ethics Committee, Compliance, or similar).
- Managed with the utmost discretion and confidentiality.

Investigations or internal investigations could be launched.

Under no circumstances will those who report in good faith be subject to retaliation.



Can I be sanctioned for a violation of the Code of Ethics, even if it is involuntary?

It depends on the context. Intentional violations are treated more severely, but reckless or negligent behavior can also result in consequences. It is always best to ask for clarification before acting in case of uncertainty.

Who can I contact for further clarification or ethical advice?

Doubts about the Code of Ethics: Internal "Whistleblowing" channel (segnalazioni@perletti.com)