

POLICY MANUAL

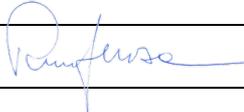


POLICY MANUAL



POLICY OF POLICIES



Version	Date	Description	Approval
V.0	26/02/2024	First group issue	

POLICY OF POLICIES

1. Policy objectives and content

For the Gerosa Group, fairness and transparency are cornerstones in conducting business and corporate activities, protecting the expectations of its shareholders, the work of its employees, the legitimate interests of the communities in which it is present with its activities and, more generally, of its stakeholders. The parent company's governing body has long since issued its own Code of Ethics, already adopted by all Group companies, which expresses and describes indispensable fundamental values that must guide the conduct of workers, employees, and business partners.

More recently, in 2023, it made a broad reflection on its corporate responsibility by identifying material issues and defined rules of conduct for each of them, which it compiled into policies. These policies, which replace and complement previously adopted policies, are adopted by the entire Group. For each policy, the functions that are most exposed to risks related to material issues are identified, and these are asked for explicit acceptance. Management is responsible for their implementation, including through training and the definition of procedures.

Responsible for updating the policies is the parent company's governing body, which periodically verifies the topicality of the material issues for which specific policies have been developed, as well as the modernity of their content, in order to incorporate new values and establish principles of conduct in line with the evolution of regulations and sensitivity, both on issues already dealt with and on new emerging issues.

The management and supervisory functions of all Group companies, by virtue of their role and knowledge, are called upon to contribute to the identification of areas for improvement.

2. List of Policies and Versions

The adoption of group policies complements and replaces policies that group companies had adopted and revised at different times. For simplicity's sake, group policies are considered to be first issued, although the group already had a large set of policies, the first dating back to the 1890s.

As of 2023, revisions and new issues will be managed by the parent company and adopted by the entire group.

Below is a list of the policies, indicating the date they were first issued and the date of their last revision.

POLICY INDEX



Version	Date	Description	Approval
V.0	26/02/2024	First group issue	

POLICY INDEX

1. List of Policies in force in the Gerosa Group

Policy	Version	First issue*	SGS (Y/N)
0 Policy of policies	26/02/24	26/02/24	N
1 Health and Safety	26/02/24	26/02/24	Y
2 Environment	26/02/24	26/02/24	Y
3 Food safety	26/02/24	26/02/24	Y
4 Quality	26/02/24	26/02/24	Y
5 Anti-Corruption and Conflict of Interest	28/07/23	28/07/23	N
6 Human Rights	28/07/23	28/07/23	N
7 Equal Opportunities and Non-Discrimination	28/07/23	28/07/23	N
8 Chain of Custody FSC	26/02/24	26/02/24	Y
9 Chain of Custody ISCC	26/02/24	26/02/24	Y
10 Fiscal	22/05/23	22/05/23	N
11 Data Protection	22/05/23	22/05/23	N
12 Whistleblowing	22/05/23	22/05/23	N
13 Intellectual and Industrial Property Rights	28/07/23	28/07/23	N
14 Antitrust and Trade Compliance	28/07/23	28/07/23	N
15 Sustainability	28/07/23	28/07/23	N

* for the Group, regardless of the presence of previous local versions

OCCUPATIONAL HEALTH AND SAFETY POLICY



Version	Date	Description	Approval
V.0	26/02/2024	First group issue	

OCCUPATIONAL HEALTH AND SAFETY POLICY

1. Objective

The Gerosa Group recognises the protection of health and safety at work as a fundamental element of its business activities. This policy aims to ensure compliance with the principle of occupational health and safety according to the UN EN ISO 45001 standard.

2. Scope of application

This policy applies to all Gerosa Group employees, suppliers and persons acting on behalf of the Gerosa Group.

3. Principles of Conduct

Gerosa Group companies carrying out production activities are required to implement, maintain and continuously improve a health and safety management system certified according to the international standard UN EN ISO 45001. Particularly:

- They appoint an internal function responsible for occupational health and safety prevention and protection;
- They carry out their activities in full compliance with applicable international, national and local laws and regulations on occupational health and safety prevention and protection;
- They define and implement an occupational health and safety risk management system, a management system that involves conducting a periodic, adequate and up-to-date risk identification and assessment, setting measurable objectives, preparing preventive and corrective action plans for their achievement and monitoring the results of the action plans;
- They apply the principle of continuous improvement when implementing and enforcing the management system;
- They implement emergency management programmes to prevent personal injury;
- Promote consultation and participation of workers and their representatives in matters of health and safety at work;
- They adopt a preventive approach to environmental protection and biodiversity integrated into decision-making processes, particularly in the definition of processes and investment choices;
- They involve and empower management and policy recipients so that they are actively engaged in achieving the objectives set for occupational health and safety prevention and protection;
- They provide continuous training for workers in order to increase competence, awareness and sensitivity in accident and disease prevention and for the adoption of healthy lifestyles;
- They promote a culture of occupational health and safety in their value chain through the indication of clear reference principles and the adoption of appropriate technical-scientific tools for the evaluation, control of characteristics and performance;
- They adopt appropriate processes for assessing suppliers with regard to occupational health and safety;
- They require their suppliers to adopt the same responsible approach to occupational health and safety issues and compliance with the occupational health and safety laws and regulations of the countries where they operate, as detailed in the Gerosa Group Supplier Code of Conduct.

4. Monitoring

OCCUPATIONAL HEALTH AND SAFETY POLICY

The internal function responsible for occupational health and safety periodically assesses compliance with the principles set out in this Policy, the proper functioning of the management system and the adequacy of the existing control mechanisms.

5. Incident and Violation Reporting

The addressees of this Policy are required to report incidents, violations and/or conduct that do not comply with this Policy in writing to their direct superior and/or the internal department responsible for occupational safety and health of each Company. Recipients may also use the whistleblowing channels set up by the Gerosa Group in the event that they consider that non-compliance with the principles of this policy may also involve a breach of a regulatory provision by following the instructions set out in the Gerosa Group Whistleblowing Policy.

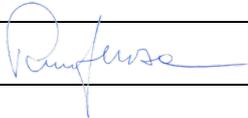
6. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

OCCUPATIONAL HEALTH AND SAFETY POLICY

ENVIRONMENTAL POLICY



Version	Date	Description	Approval
V.0	26/02/2024	First group issue	

ENVIRONMENTAL POLICY

1. Objective

The Gerosa Group recognises the protection of the environment and biodiversity as a fundamental element of its business activities. This policy aims to ensure respect for the environment and biodiversity and is committed to disseminating and consolidating a culture of environmental protection and biodiversity according to the international standard UN EN ISO 14001.

2. Scope of application

This policy applies to all Gerosa Group employees, suppliers and persons acting on behalf of the Gerosa Group.

3. Principles of Conduct

Gerosa Group companies carrying out production activities are required to implement, maintain and continuously improve an environmental management system certified according to the international standard UN EN ISO 14001. Particularly:

- They appoint an internal function responsible for environmental protection;
- They carry out their activities in full compliance with applicable international, national and local environmental laws and regulations;
- They define and implement an environmental and biodiversity risk management system that includes conducting regular, adequate and up-to-date risk identification and assessment, setting measurable objectives, preparing preventive and corrective action plans to achieve them, and monitoring the results of the action plans;
- They apply the principle of continuous improvement in the implementation and implementation of management system processes;
- They implement emergency management programmes to prevent environmental damage;
- They adopt a preventive approach to environmental protection and biodiversity integrated into decision-making processes, particularly in the definition of processes and investment choices;
- They involve and empower management and the recipients of this policy so that they are committed to achieving the environmental objectives set;
- They provide continuous training for workers in order to increase environmental competence, awareness and sensitivity;
- They promote a culture of respect for the environment in their value chain through the indication of clear reference principles and the adoption of appropriate technical-scientific tools for the evaluation, control of characteristics and performance;
- They adopt appropriate processes for assessing suppliers with regard to environmental risks;
- They require their suppliers to adopt the same responsible approach to environmental protection and compliance with the environmental laws and regulations of the countries where they operate, as detailed in the Gerosa Group Supplier Code of Conduct.

4. Monitoring

The internal function responsible for environmental protection periodically assesses compliance with the principles set out in this Policy, the proper functioning of the management system and the adequacy of the existing control mechanisms.

5. Incident and Violation Reporting

Recipients of this Policy are required to report incidents, violations and/or conduct that do not comply with this Policy in writing to their direct superior and/or the internal department responsible for environmental protection of each Company. Recipients will also be able to use the reporting tools set up by the Gerosa

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Group in the event that they consider that non-compliance with the principles of this policy may also involve a breach of a regulatory provision by following the instructions set out in the Gerosa Group Whistleblowing Policy.

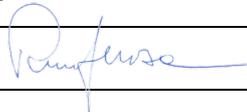
6. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

ENVIRONMENTAL POLICY

FOOD SAFETY POLICY



Version	Date	Description	Approval
V.0	26/02/2024	First group issue	

FOOD SAFETY POLICY

1. Objective

The Gerosa Group recognises the food safety of its products as a fundamental element of corporate responsibility and a key determinant of its success in the market. The aim of this policy is to ensure that Gerosa Group products comply with the international BRC (Brand Reputation through Compliance) Global Standard Packaging Materials.

2. Scope of application

This policy applies to all employees of the Gerosa Group, suppliers and persons acting on behalf of the Group.

3. Definitions

Food safety: the guarantee that a food will not cause harm after it has been prepared and/or consumed in accordance with its intended use. It is related to the presence of hazards that can be introduced at any point in the food chain. Organisations operating in the food chain must have the capacity to control food safety hazards by fulfilling all necessary requirements and implementing appropriate risk management measures considering continuous updates in scientific knowledge and in accordance with international standards such as the BRCGS.

MOCA: materials and articles intended to come into contact with food.

GMP: good manufacturing practices, the aspects of quality assurance that ensure that materials and articles are consistently manufactured and controlled to ensure compliance with the applicable regulations and quality standards appropriate to their intended use, without posing a risk to human health or unacceptably altering the composition of the foodstuff or causing a deterioration in its organoleptic characteristics.

4. Principles of Conduct

Gerosa Group companies carrying out production activities are required to implement, maintain and continuously improve a food safety management system according to the international BRC (Brand Reputation through Compliance) Global Standard Packaging Materials. Particularly:

- They appoint an internal function responsible for food safety;
- They define and implement a contamination risk management system linked to the non-performance of their products both in terms of protection and maintenance of the organoleptic qualities of the foodstuffs for which they are intended, a management system that involves conducting a periodic, adequate and up-to-date risk identification and assessment, defining measurable objectives, preparing preventive and corrective action plans for their achievement and monitoring the results of the action plans;
- They apply the principle of continuous improvement in the implementation and implementation of management system processes;
- They use internationally recognised science-based references and models such as the *Codex Alimentarius*;
- They define processes and equip themselves with the tools for hygiene prevention in line with the principles of the HACCP and HARA system according to the appropriate GMP (Good Manufacturing Practices) guidelines;
- They involve and empower management and the recipients of this policy to be committed to achieving the set food safety objectives;
- They provide continuous training of personnel in order to enable them to consciously manage food safety in the various areas of activity and in relation to the evolution and complexity of regulations and product and production processes;

FOOD SAFETY POLICY

- They adopt appropriate processes for evaluating suppliers with regard to food safety;
- They promote a culture of food safety in their value chain by indicating clear reference principles.

5. Monitoring

The food safety function designated by the companies belonging to the Gerosa Group periodically assesses compliance with the principles set out in this Policy, the proper functioning of the management system, compliance with the rules and the adequacy of the existing control systems.

6. Incident and Violation Reporting

Individuals to whom this Policy is addressed are required to report food safety incidents, violations and/or conduct that do not comply with this Policy in writing to their direct supervisor and/or the food safety function of each company. Recipients may also use the whistleblowing channels set up by the Gerosa Group in the event that they consider that non-compliance with the principles of this policy may also involve a breach of a regulatory provision by following the instructions set out in the Gerosa Group Whistleblowing Policy.

7. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

FOOD SAFETY POLICY

QUALITY POLICY



Version	Date	Description	Approval
V.0	26/02/2024	First group issue	

QUALITY POLICY

1. Objective

The Gerosa Group recognises quality as a fundamental element of its business activities and is committed to ensuring the quality of its products, services and processes. This Policy aims to ensure the quality of the Gerosa Group's products, services and processes according to the international standard ISO 9001.

2. Scope of application

This policy applies to all Gerosa Group employees, suppliers and persons acting on behalf of the Group.

3. Principles of Conduct

Gerosa Group companies carrying out production activities are required to implement, maintain and continuously improve a quality management system certified to the international ISO 9001 standard. Particularly:

- They appoint an internal function responsible for quality;
- They define and implement a risk management system related to the quality of their products and services, which includes conducting periodic, adequate and up-to-date risk identification and assessment, setting measurable objectives, preparing preventive and corrective action plans for their achievement, and monitoring the results obtained;
- They apply the principle of continuous improvement in the implementation and implementation of management system processes;
- Involve and empower management and the recipients of this policy, and ensure that they are committed to achieving the set quality objectives;
- They provide continuous training of personnel, in order to enable a conscious management of quality in the different areas of activity and in relation to the evolution and complexity of production processes and product;
- They promote a culture of quality in their value chain by indicating clear reference principles and appropriate technical-scientific tools useful for the evaluation and control of characteristics and performance;
- They adopt appropriate quality assessment processes for products and services received from suppliers and introduced into the production cycle;
- They require their suppliers to adopt the same responsible approach to quality.

4. Monitoring

The internal quality function periodically assesses compliance with the principles set out in this Policy, the proper functioning of the quality management system and the adequacy of the existing control mechanisms.

5. Incident and Violation Reporting

The addressees of this Policy are required to report incidents, violations and/or conduct that do not comply with this Policy in writing to their direct superior and/or to the internal function responsible for quality in each company. Recipients may also use the whistleblowing channels set up by the Gerosa Group in the event that they consider that non-compliance with the principles of this policy may also involve a breach of a regulatory provision by following the instructions set out in the Gerosa Group Whistleblowing Policy.

6. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may

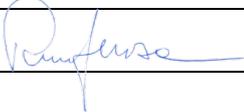
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take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

QUALITY POLICY

ANTI-CORRUPTION POLICY AND CONFLICT OF INTEREST



Version	Date	Description	Approval
V.0	28/07/2023	First group issue	



ANTI-CORRUPTION POLICY AND CONFLICT OF INTEREST

1. Objective

The purpose of this policy is to ensure compliance with applicable international and local anti-corruption laws and to define the principles of conduct that recipients must follow in order to prevent any form of corruption.

1. Scope of application

This policy applies to all Gerosa Group employees and independent third parties acting on behalf of the Group.

2. Definitions

Bribery: is a criminal offence consisting in offering, promising, giving, accepting or soliciting an undue advantage (of an economic or non-economic nature) directly or indirectly through an intermediary, in violation of applicable laws, as an inducement or reward for a person to commit an act or omission contrary to his or her official duties, in order to obtain or retain an unfair advantage. The mere offer or proposal of an advantage with an illicit purpose is regarded as bribery.

Active corruption: consists in offering an illicit advantage.

Passive bribery: consists in accepting an illicit advantage.

Private bribery: refers to bribery in the context of business dealings between private individuals.

Public corruption: refers to corruption in the context of relations between a private company and public officials.

Corrupt conduct: refers to adopting, promising, offering money, advantage or something of value to a person in order to influence that person's judgement or conduct, procure services or gain influence. Accepting money, an advantage or something of value in order to favour a person or company is also considered corrupt conduct.

Facilitation payment: unofficial payments made to a Public Official for the purpose of expediting, facilitating or securing the performance of a business activity.

Public official: employees of (a) official government bodies; (b) government-owned or government-controlled companies or enterprises; and (c) publicly funded organisations such as the European Parliament, United Nations, etc. Also included in the definition of public officials are officials of political parties, candidates for public office and members of royal families when performing governmental functions and persons performing public functions.

Business partners/business associates: independent third parties acting on behalf of the Group such as consultants, intermediaries, distributors, commercial agents, joint venture partners and third parties acting on behalf of and/or in the name of the Company.

3. Principles of Conduct

In line with the Group's Code of Ethics, the Gerosa Group does not tolerate any kind of corruption towards public officials, customers, suppliers or any other party.

Therefore, the Gerosa Group prohibits:

- offering, promising, giving, paying, directly or indirectly, material benefits, economic advantages or other utilities to a Public Official or a private individual (Active Corruption);

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- directly or indirectly accepting economic advantages or other benefits or requests or solicitations for economic advantages or other benefits from a Public Official or a private individual (Passive Corruption);

with the aim of

- inducing a public official or a private individual to improperly perform any function of a public nature, or any activity associated with the company's business, or rewarding him for having performed it;
- influence the decision of a Public Official in the performance of his duties in breach of his official duty;
- obtain or secure an improper advantage in connection with business activities; or
- in any event violate applicable laws on the prevention of corruption.

Specific rules of conduct:

Commercial, commercial agency, distribution and intermediary activities

- Commercial agreements with customers and contracts with commercial agents, distributors and intermediaries acting in the name of and/or on behalf of the Group must be formalised in writing before any activity takes place and must only be paid for in accordance with the terms of the contract. To this end, contracts with commercial agents, distributors and intermediaries acting in the name of and/or on behalf of the Group must contain a confidentiality agreement and a clause committing the counterparty to comply with the Gerosa Group Supplier Code of Conduct. All written contracts with commercial agents, distributors and intermediaries must provide for reasonable and appropriate remuneration and provisions for regulatory compliance.
- Comply with the company procedures applicable to your area, the Group's Code of Ethics and the principles of conduct contained in the Gerosa Group's policies, in particular the rules of conduct set out in this anti-corruption policy.
- Sharing with Gerosa Group customers the ethical principles contained in the Group's Code of Ethics. If the relationship with the customer allows it, request acceptance of the Group's Code of Ethics and include a confidentiality pact in the commercial agreements.
- Thoroughly examine all cases of product loss and take the necessary measures to mitigate the risk of further loss.

Gifts, hospitality, donations and sponsorships

- It is expressly forbidden for employees and independent third parties acting in the name and on behalf of the Group to offer, accept or receive to/from anyone gifts, hospitality, gratuities and/or benefits that may even be construed as exceeding normal business practices or courtesy, or be intended to obtain favourable treatment or benefit in the conduct of any business activity.
- The only forms of gifts and hospitality allowed, as a form of business courtesy, must be:
 - of low value, i.e. commensurate with the circumstances and the nature of the recipient;
 - granted in good faith and in accordance with common decency;
 - conforming to generally accepted standards of professional courtesy (e.g. Christmas parcel) or for promotional/demonstrative purposes;
 - not consist of cash payment;
 - in line with Anti-Corruption Laws, local laws and applicable regulations.
- Gerosa Group Companies may provide meals, travel, accommodation expenses, event assistance or other reasonable and appropriate hospitality benefits to customers or business associates when such expenses are directly related to the performance of a contract or the promotion, demonstration or

ANTI-CORRUPTION POLICY AND CONFLICT OF INTEREST

explanation of products or services provided by the Company. Such hospitality expenses must comply with the expenditure limits set by the Gerosa Group Companies and be specifically approved by the competent internal functions.

- The Gerosa Group prohibits facilitation payments made either directly by Group companies or indirectly through an intermediary.
- All relations with trade unions or their management must be ethical, transparent and in accordance with the applicable collective labour agreement, labour law, the Group Code of Ethics and this Policy.
- Gerosa Group employees and independent third parties acting in the name and on behalf of the Group, when interacting with a public official, shall ensure compliance with the Code of Ethics and the Anti-Bribery Policy.
- Charitable donations are prohibited if given or received with the intention of influencing someone to act unlawfully, or as a reward for acting unlawfully. All charitable contributions must be approved, for the purposes of compliance with this Policy, by the general management of the Gerosa Group Companies.
- The Gerosa Group requires compliance by Business Partners with applicable laws, including Anti-Bribery Laws, in the context of their business activities with the Gerosa Group. As such, Business Partners shall accept the Supplier Code of Conduct and this Anti-Corruption Policy. Business partners must enter into written contracts before carrying out any activity for or on behalf of the Gerosa Group and must only be paid in accordance with the terms of the contract. All written contracts with business partners must provide for reasonable and appropriate remuneration and provisions for regulatory compliance. These rules of conduct also apply to joint venture partners.
- All sponsorship activities must be approved in compliance with anti-corruption rules by the relevant departments of Gerosa Group companies and comply with this policy.

Conflict of interests

- Corruption often starts with a conflict of interest. A conflict of interest exists when one abuses one's position for private profit. The Gerosa Group requires its employees to declare a conflict of interest, as provided for in the Group's Code of Ethics, and to refrain from conduct in a conflict of interest situation.
- Personnel involved in product sales, personnel selection and recruitment, and supplier selection activities are required to observe the company's conduct policies. Every employee of the company directly involved as a recruiter in the process of evaluating candidates and selecting suppliers is also required to sign a specific declaration of exclusion of potential conflicts of interest.

Contributions to political parties

- the Gerosa Group does not allow any direct or indirect contribution in any form whatsoever, to political parties, movements, committees, political organisations and trade unions, nor to their representatives and candidates, with the exception of those specifically considered mandatory by applicable laws and regulations. In case of doubt as to the mandatory nature of the contribution, the Supervisory Board or the internal control function of each company should be consulted.

Accounting Entries

- The company's books and records must accurately and adequately reflect, in reasonable detail, all monetary and financial transactions and uses of goods and services. All business relations with independent third parties must be documented by means of contracts.
- All expenses incurred for gifts, donations, hospitality and sponsorships will be recorded in a separate accounting record called 'gifts, donations, hospitality and sponsorships' in order to facilitate traceability and monitoring.

ANTI-CORRUPTION POLICY AND CONFLICT OF INTEREST

- The creation of funds against the purchase of goods or professional services that do not exist in whole or in part is prohibited. It is forbidden to falsify accounting records or company accounts.

Gerosa Group companies will adopt specific procedures to manage corruption risk according to the level of risk identified.

4. Monitoring

The Supervisory Board or the internal control function designated by the Companies belonging to the Gerosa Group periodically assesses compliance with the principles set out in this Policy and the adequacy of the existing control measures to manage the risk of corruption.

5. Communication of violations

The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

6. Disciplinary sanctions and contractual responsibilities

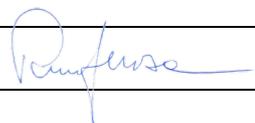
Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

ANTI-CORRUPTION POLICY AND CONFLICT OF INTEREST



HUMAN RIGHTS POLICY



Version	Date	Description	Approval
V.0	28/07/2023	First group issue	

HUMAN RIGHTS POLICY

1. Objective

This policy aims to ensure respect for Human Rights by Gerosa Group companies, suppliers and business associates.

The Gerosa Group recognises that respect for fundamental human rights is an indispensable condition in the conduct of its business. This policy is aligned with the requirements of the UN Universal Declaration of Human Rights, the UN Global Compact, the core International Labour Organisation (ILO) Conventions, the European Convention on Human Rights, and the OECD Guidelines for Multinational Enterprises.

The Gerosa Group is committed to respecting and promoting respect for Human Rights among its partners, and has adopted a Code of Conduct for Suppliers in order to set out guidelines for conduct in this area.

2. Scope of application

This policy applies to all employees of the Gerosa Group and to suppliers and business associates (the 'Suppliers') involved in business relations, whether as individuals or in the form of a company, with the Gerosa Group. Business partners include: contractors, subcontractors, consultants, professionals, joint venture partners, distributors, commercial agents, suppliers, intermediaries and representatives of Gerosa Group companies. To this end, the Group has adopted a Code of Conduct for Suppliers that identifies the principles of conduct related to human rights that suppliers must respect.

3. Principles of Conduct

Respect for human rights is an indispensable element of the Gerosa Group's business. In order to achieve these objectives, the following behavioural principles have been defined as mandatory and independent of any less restrictive legislative limits:

• Employment relations

The Gerosa Group undertakes to formalise employment contracts with its employees in writing specifying the conditions of the employment relationship, salary and benefits, and no employment relationships will be entered into for the purpose of evading its labour and social security obligations.

Remuneration will not be lower than what is stipulated by law or, if you are a signatory to an industry contract.

Employees will receive information on the economic conditions of employment before recruitment and during the course of employment.

Working hours comply with national laws or, where they offer greater protection, industry regulations, as do overtime hours and their remuneration.

The group also undertakes not to use workers without a regular residence permit and not to use forced labour or labour performed under conditions of slavery or servitude.

• Child labour

The Gerosa Group does not employ any form of child labour, i.e. it does not employ any person younger than the minimum age stipulated by the laws in force in the country where the work is performed and, in any case, younger than 15 years of age. The Group also undertakes not to establish or maintain business relationships with suppliers who employ child labour, as defined above.

• Forced labour

HUMAN RIGHTS POLICY

The Gerosa Group considers the exploitation of forced or compulsory labour to be unacceptable, nor does it confiscate money or identity documents at the beginning of the employment relationship for the purpose of holding the worker against his or her will. The Group also undertakes not to establish or maintain business relations with suppliers that do not guarantee this principle.

- **Non-discrimination and harassment**

Harassment can occur in many different forms. The Group considers totally unacceptable and prohibits any type of harassment or harassing behaviour, such as those related to race, gender or other personal characteristics, that has the purpose or effect of creating a hostile work environment, violating the dignity of the person to whom such harassment or behaviour is directed, or requesting sexual favours in exchange for a job advantage (for example, to obtain a pay rise or to avert the risk of dismissal), whether inside or outside the workplace.

The Gerosa Group does not tolerate any form of discrimination against its employees and third parties on the basis of: ethnic origin, religion, political opinion, country of origin, state of health or physical ability, age and sex, marital status, sexual orientation, disability, membership of trade unions or political parties, or personal beliefs.

Group hires its employees on the basis of their qualities and abilities and is committed to offering all employees equal opportunities both in employment and professional advancement.

- **Health and safety at work**

The Group is committed to protecting and promoting the health and safety of its employees and customers.

- **Freedom of association**

Employees are free to join a trade union in accordance with local trade union laws and regulations. The Group recognises and respects the right of its employees to be represented by trade unions or other elected representatives in accordance with local laws and practices. In conducting negotiations with such representatives, the Company's actions and conduct are aimed at maintaining a constructive approach and relationship.

- **Privacy and personal data protection**

The Group is committed to upholding values such as confidentiality, the opinions of each individual and the right to protection of personal data, in compliance with applicable laws.

- **Integrity**

The Gerosa Group rejects all forms of corruption in any jurisdiction. To this end, the Group has adopted an Anti-Corruption Policy, which constitutes the company's benchmark for preventing corrupt practices and represents a collection of principles and rules aimed at preventing or reducing the risk of corruption.

- **Retaliation**

Gerosa Group prohibits and will not tolerate any form of retaliation against anyone who, in good faith, has reported possible violations of this Policy and infringements. Retaliation in any form may result in disciplinary action.

- **Local communities**

The Group is aware that its decisions can have a significant impact, both direct and indirect, on the local communities in which it operates. Therefore, the Gerosa Group is committed to implementing all reasonable measures to inform these communities about the actions and projects that affect them and to promote an open dialogue to ensure that their legitimate expectations are duly taken into account. Furthermore, the

HUMAN RIGHTS POLICY

Group intends to contribute to the social, economic and institutional development of local communities through specific programmes. Area managers are required to maintain socially responsible behaviour by respecting local cultures and customs and to act with integrity and in good faith in order to merit the trust of the community.

In order to assess suppliers' and business partners' compliance with these principles, the Gerosa Group has adopted due diligence processes against human rights violations in order to responsibly manage its supply chain. Furthermore, the Group requires its suppliers and business partners to respect human rights.

Gerosa Group companies must therefore apply the following principles of conduct:

- Raise awareness among their workers through information and training so that they conduct their business activities with respect for human rights.
- Manage suppliers responsibly by applying the Group's due diligence processes.
- Include respect for human rights in its supplier selection criteria, contractual clauses and audits.
- Appoint an internal function or functions responsible for implementing and applying the principles of this policy.

4. Monitoring

The Supervisory Board or the internal control function designated by the Companies belonging to the Gerosa Group periodically assesses compliance with the principles set out in this Policy and the adequacy of the existing control structures.

5. Communication of violations

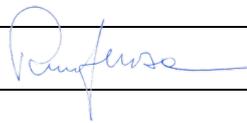
The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

6. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

EQUAL OPPORTUNITIES AND NON-DISCRIMINATION POLICY



Version	Date	Description	Approval
V.0	28/07/2023	First group issue	



EQUAL OPPORTUNITIES AND NON-DISCRIMINATION POLICY

1. Objective

The purpose of this policy is to ensure respect for the principle of equal opportunities and non-discrimination in the Gerosa Group's working environment and to define the principles of conduct to be followed by the recipients in order to prevent any form of discrimination and inequality. The purpose of this policy is also to promote the values of Diversity, Equality and Inclusion within the Gerosa Group, which all the addressees of this policy are required to observe in their working environment.

2. Scope of application

This policy applies to all Gerosa Group employees.

3. Definitions

Diversity: diversity refers to all differences between groups and individuals. In this sense, the definition of diversity encompasses everything that makes people unique and incomparable, including ethnicity, age, style, gender, personality, religious and political beliefs, experiences, sexual and emotional orientation, psychological, cognitive, physical and social differences specific to each individual, and other personal characteristics

Inclusion: The concept of inclusion encompasses the recognition, understanding and appreciation of diversity as a resource and the use of diversity in a positive way, creating a fair and welcoming physical and social environment.

Equality: Equality is the process of ensuring that processes and programmes are impartial, providing equal outcomes for every individual.

4. Principles of Conduct

The Gerosa Group guarantees the application of the principles of equal opportunities and non-discrimination, especially in the processes of recruitment, selection, training, remuneration, professional grading, career management and promotions and personnel management.

In order to ensure the correct application of the aforementioned principles and values, the Gerosa Group has defined the following principles of conduct to be pursued by the Gerosa Group companies:

- Comply with regulations on equal opportunities and non-discrimination at work.
- Offer equal opportunities in every aspect of working life, in selection as well as in decisions concerning pay, job grading, job assignment, training, career progression and termination of employment. Decisions concerning the management and development of people must be free of all forms of discrimination.
- Making decisions on selection, remuneration, professional grading, termination of employment on the basis of skills, experience, employment relationship, professional profile of individuals and professional performance, without regard to gender, gender identity and expression, sexual orientation, marital status, parental status, religious beliefs, political and trade union opinions or other views, ethnic origin, nationality, age and condition of different abilities, whether mental or physical.
- Ensure a healthy and positive working environment in which each person is treated and treats others with dignity and respect, free from all forms of harassment and violence at work, abuse, psychological and/or physical coercion and discrimination against individuals or groups by other individuals or groups. In this sense, Gerosa Group companies implement organisational measures to prevent, communicate, manage and stop such behaviour, including bullying at work.

EQUAL OPPORTUNITIES AND NON-DISCRIMINATION POLICY

- Define business processes to support all people without distinction, so that each person has the same opportunities.
- Carry out awareness-raising and training activities on the principles of equal opportunities and non-discrimination.
- Ensure gender pay equality on equal meritocratic terms. If any wage gaps are identified, they will have to be progressively closed.
- Appoint an internal function responsible for implementing and enforcing the principles of this policy.

The Gerosa Group companies will adopt organisational and technical measures in order to comply with the aforementioned principles and with the legal obligations provided for by the regulations in force on equal opportunities and non-discrimination at work.

5. Monitoring

The Supervisory Board or the internal control function designated by the Companies belonging to the Gerosa Group periodically assesses compliance with the principles set out in this Policy and the adequacy of the existing control structures.

6. Communication of violations

The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

7. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

EQUAL OPPORTUNITIES AND NON-DISCRIMINATION POLICY

FSC CoC POLICY



Version	Date	Description	Approval
V.0	26/02/2024	First group issue	

FSC CoC POLICY

1. Objective

This policy aims to ensure the requirements of the Chain-of-Custody Standard FSC-STD-40-004 and the FSC values stated in the reference document FSC-POL-01-004.

2. Scope of application

This policy applies to all Gerosa Group employees and independent third parties acting on behalf of the Group.

3. Principles of Conduct

Gerosa Group companies are required to adopt the requirements of the FSC standard in the production of their goods and where applicable.

They are committed to market and promote FSC sustainable products and offer, upon customers' request, sustainable products supported by the appropriate FSC declaration.

They are required to manage the procurement of raw materials used in FSC-recognised sustainable products by verifying the supplier's full and ongoing compliance with the requirements of the FSC Standard.

They are required to manage FSC sustainable materials according to traceability, chain of custody required by the FSC scheme, avoiding any possibility of multiple accounting.

They are required to operate according to good management practices and the principle of continuous improvement. The Gerosa Group prohibits direct or indirect involvement in the following activities:

- Illegal logging or illegal trade in timber or forest products;
- Violation of traditions and human rights in forestry operations;
- Destruction of High Conservation Value Forests (HCVF);
- Significant conversion of forests to plantations or conversion to other non-forest uses;
- Introduction of genetically modified organisms in forestry operations;
- Violation of any ILO (International Labour Organisation) Core Convention, as defined in the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

4. Monitoring

The internal function responsible for FSC CoC periodically assesses compliance with the principles set out in this Policy, the proper functioning of the FSC CoC system, and the adequacy of the existing control mechanisms.

5. Incident and Violation Reporting

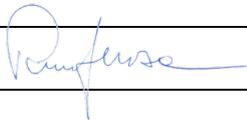
The addressees of this Policy are required to report incidents, violations and/or conduct that do not comply with this Policy in writing to their direct superior and/or the internal function responsible for each Company. Recipients may also use the whistleblowing channels set up by the Gerosa Group in the event that they consider that non-compliance with the principles of this policy may also involve a breach of a regulatory provision by following the instructions set out in the Gerosa Group Whistleblowing Policy.

6. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

ISCC Plus POLICY



Version	Date	Description	Approval
V.0	26/02/2024	First group issue	

ISCC Plus POLICY

1. Objective

This Policy aims to ensure the requirements of the International Sustainability and carbon Certification Plus (ISCC Plus) chain of custody standard.

2. Scope of application

This policy applies to all employees of the Gerosa Group and to third parties acting in the name and on behalf of the Group.

3. Principles of Conduct

Gerosa Group companies are required to adopt the requirements of the ISCC Plus standard in the production of their goods where applicable.

Consistent with the above, the following objectives were defined:

They are committed to market and promote sustainable products recognised by ISCC Plus and offer, at the request of their customers, sustainable products supported by an appropriate ISCC Plus Sustainability Declaration.

They are required to manage the sourcing of raw materials used in ISCC+ recognised sustainable products by verifying that the supplier fully and consistently meets the requirements of the ISCC Plus Standard.

They are required to manage ISCC Plus sustainable materials according to traceability, chain of custody and mass balance application required by the ISCC plus scheme and avoiding any possibility of multiple accounting.

They are required to operate according to good management practices and the principle of continuous improvement

The company's stakeholders are constantly informed about the commitment to and compliance with the above principles and the availability of sustainable products.

4. Monitoring

The internal function responsible for ISCC Plus periodically assesses compliance with the principles set out in this Policy, the proper functioning of the ISCC Plus system, and the adequacy of the existing control arrangements.

5. Incident and Violation Reporting

The addressees of this Policy are required to report incidents, violations and/or conduct that do not comply with this Policy in writing to their direct superior and/or the internal function responsible for each Company. Recipients may also use the whistleblowing channels set up by the Gerosa Group in the event that they consider that non-compliance with the principles of this policy may also involve a breach of a regulatory provision by following the instructions set out in the Gerosa Group Whistleblowing Policy.

6. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

FISCAL POLICY



Version	Date	Description	Approval
V.0	22/05/2023	First group issue	

FISCAL POLICY

1. Objective

The purpose of this policy is to ensure compliance with fiscal regulations and to define the principles of conduct to be followed by recipients in order to manage the risks of non-compliance with fiscal regulations.

2. Scope of application

This policy applies to all Gerosa Group employees and independent third parties acting on behalf of the Group.

3. Principles of Conduct

In order to ensure uniform tax risk management¹, the Gerosa Group has defined the following principles of conduct to be followed by the Gerosa Group companies:

- Identify applicable tax regulations, assess tax risks, and put in place appropriate controls to ensure tax compliance.
- Appoint an internal manager in each Group company in charge of tax compliance;
- Periodically inform the Board of Directors of the relevant company about the management of tax risks and request the General Manager of the relevant company for approval of the most relevant fiscal transactions.
- Cooperate with the fiscal authorities in accordance with the principles of transparency, good faith and professional loyalty by making available to them in a timely manner the necessary information and feedback on requests received.
- Act and make decisions on the correct application and interpretation of applicable fiscal regulations in an informed manner, making use of the necessary business, financial, accounting and legal information. Any uncertainties or doubts must be resolved by a reasonable interpretation, inspired by the principle of legality.
- Reducing conflicts arising from the interpretation of applicable fiscal regulations by favouring the use of tools for dialogue with the fiscal authority and by availing of the support of external consultants of proven professionalism in the case of fiscal issues of particular fiscal complexity or when there are doubts about the interpretation of regulations and laws.
- Promote the implementation in companies of all necessary good fiscal practices that can lead to the reduction of possible areas of significant uncertainty and the prevention of behaviour that could generate them.
- Always guarantee the veracity and integrity of the data and information declared to the respective fiscal authorities.
- Make payment of applicable fees and taxes within the time limits and in the form prescribed by the applicable regulations.
- Avoid the use of corporate processes or structures designed to prevent the fiscal authorities from knowing the beneficial owner of the activities performed and/or the ultimate owner of the goods or services.
- Always ensure the availability of supporting documentation of corporate transactions carried out as long as they are not prescribed.
- Ensuring that accounting records are kept accurately, completely and in a timely manner in compliance with the company's accounting procedures, in order to give a true and fair view of the economic, asset and financial situation of the business.

¹ Fiscal risks are defined as the risk of operating in violation of tax regulations or contrary to the principles or purposes of the tax system.

FISCAL POLICY

- Do not engage in transactions, whether domestic or transnational, without valid business and economic motives, or whose main purpose is to obtain a fiscal advantage, or purely artificial in order to thwart the purposes of the relevant tax laws.
- Intra-group transactions must be carried out in accordance with the arm's length principle.
- Have the company's financial statements audited.

The correct application of tax law does not exclude that, in order to protect the interests of the company and its shareholders, it is legitimate and necessary to uphold, even in litigation, any reasonable interpretative positions that differ from the guidelines expressed by the competent fiscal authorities.

Company employees involved in fiscal-related matters must:

- Manage and comply with the fiscal guidelines and procedures of the relevant company.
- Make decisions on the correct application and interpretation of applicable fiscal regulations in an informed manner.
- Ensure that all fiscal-related decisions are authorised internally by the relevant departmental managers.
- Seeking written advice from recognised external fiscal advisors when fiscal issues may be subject to different types of interpretation, the importance of the transaction requires it or **the fiscal issues are of particular relevance or fiscal complexity**:
- Promote collaborative relationships with fiscal authorities, government agencies and other related third parties in a professional and appropriate manner.
- Carry out all necessary actions with the fiscal authorities in order to minimise litigation.
- Review fiscal policies and procedures periodically to ensure their validity at all times.

Employees of Gerosa Group companies shall inform the internal manager in charge of compliance with the reference company's fiscal obligations of all fiscal matters of particular relevance or complexity that may generate a fiscal risk.

Issues of particular relevance or fiscal complexity will be considered, by way of example:

- Particularly complex labour issues that may affect social security contributions.
- Significant changes in accounting policies that may have fiscal effects.
- Review of the pricing of transactions between related parties involving a change in the Group's criteria.
- Restructuring operations, corporate transactions, financing operations and shareholder remuneration.
- Transactions with countries defined as 'tax havens' on international blacklists.

The internal manager in charge of compliance with the Company's fiscal obligations shall inform the Board of Directors of the relevant Company of **matters of particular relevance or fiscal complexity and of the decisions taken**.

Once the opinion of the internal manager in charge of compliance with the Company's fiscal obligations has been obtained, the General Manager of the relevant Company is required to formally approve fiscal transactions of particular significance in writing.

FISCAL POLICY

Related-party transactions²

The Gerosa Group expresses its willingness to respect and act on Transfer Pricing principles in line with the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.³

Therefore, the relations and prices applied to the purchase and sale of intra-group goods and services will be regulated, for tax purposes, on the basis of market prices, in observance of free competition, and will be documented and illustrated in the specific "Transfer Pricing" documentation.

Regardless of compliance with the regulations of the jurisdiction in which each of the Gerosa Group companies operates, it is mandatory to document all intra-group or related party transactions, demonstrating and justifying the established transfer prices.

External consulting, documentation and traceability:

All decisions on issues of particular relevance or fiscal complexity must be supported by a written opinion of an external consultant specialised in tax law and/or after written consultation with the fiscal authority.

It shall be the responsibility of the internal manager in charge of compliance with the Company's fiscal obligations to request a written opinion from the external advisor on the issue of particular relevance or fiscal complexity and/or to coordinate the interpellation to the fiscal authority.

In the event that the decision on matters of particular relevance or fiscal complexity differs from the opinion of the external consultant specialised in tax law and/or the opinion of the fiscal authority, the internal manager in charge of compliance with the Company's fiscal obligations shall justify in writing such decision contrary to the opinion of the consultant and/or the fiscal authority and inform the General Manager of the relevant Company so that they can make a decision on the matter by approving or not approving the transaction. The decision must be documented in writing. In addition, the General Manager shall forward this information to the relevant Board of Directors.

4. Monitoring

The Supervisory Board or the internal control function designated by the Companies belonging to the Gerosa Group periodically assesses the compliance with the principles set out in this Policy and the adequacy of the existing control structures in order to manage the fiscal risk.

5. Communication of violations

The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

6. Disciplinary sanctions and contractual responsibilities

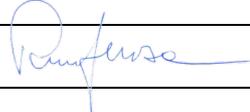
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² Related parties are those entities that have the ability to control another entity, i.e., to exercise significant influence over the financial operational decisions of the reporting company.

³ Principle, recognised internationally and applied for tax purposes by multinational groups and fiscal administrations for transfer pricing purposes, according to which the price established in intercompany commercial transactions must correspond to the price that would have been established between independent enterprises for identical (or similar/similar) transactions operating in the free market.

PERSONAL DATA PROTECTION POLICY



Version	Date	Description	Approval
V.0	22/05/2023	First group issue	

PERSONAL DATA PROTECTION POLICY

1. Objective

The purpose of this policy is to ensure compliance with the laws applicable to the Gerosa Group on the protection of personal data and to define the principles of conduct that recipients must follow when processing personal data.

2. Scope of application

This policy applies to all Gerosa Group employees involved in the processing of personal data and to independent third parties acting on behalf of the Group and processing personal data.

3. Definitions

Personal data: Any information relating to an identified or identifiable natural person (data subject); an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity;

Processing: Any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, and which is characteristic of the physical, physiological, genetic, mental, economic, cultural or social identity of the data subject;

Consent of the data subject: any manifestation of the data subject's free, specific, informed and unambiguous will, whereby the data subject indicates his/her assent, by way of a statement or unambiguous affirmative action, that personal data relating to him/her be processed.

Data subject: the natural person to whom the personal data being processed refer.

4. Principles of Conduct

In line with the Group's Code of Ethics, the Gerosa Group is aware of the importance of protecting the respect of privacy and of the regulations in force concerning the processing of personal data. For this reason, the Gerosa Group will process personal data in compliance with the following principles:

- **Lawfulness:** processing activities carried out by Gerosa Group companies must be based on a condition of lawfulness provided for by the legislation, be carried out for lawful and not unlawful purposes and comply with the applicable laws.
- **Transparency:** Gerosa Group companies will inform data subjects at the time of collecting personal data of the essential elements of the processing activities that will be carried out in compliance with the applicable regulations.
- **Determinacy of purpose:** the collection and recording of personal data must be for the pursuit of specified, explicit and legitimate purposes established in advance and duly communicated to the data subjects.
- **Necessity, accuracy and minimisation:** processing activities carried out by Gerosa Group companies must only be carried out when it is necessary to process personal data. If it is not necessary to process personal data for the pursuit of the purpose, the data must be anonymised. Furthermore, personal data must be accurate and, where necessary, kept up to date and adequate, relevant and limited to what is necessary for the purposes for which they are processed.
- **Limitation of storage:** personal data must be processed for a period of time not exceeding that required to pursue the purposes, after which it must be destroyed or rendered anonymous, without prejudice to the need to store it if required by applicable laws.

PERSONAL DATA PROTECTION POLICY

- **Consent:** the prior written consent of the data subjects is required for the processing of certain types of data or for certain purposes, unless exceptions are provided for by local regulations. Consent must be a free, specific, informed and unequivocal manifestation of the will of the person concerned.
- **Rights of the interested parties:** the interested parties always have the right, within the limits provided for by the applicable laws, to receive confirmation of the existence or otherwise of personal data concerning them, to know the personal data referring to them that are processed by the Companies of the Gerosa group and the origin of the same, to be informed of the subjects or categories of subjects to whom the data may be communicated, to request the updating, rectification or integration of the same, and, if the conditions are met, the cancellation as well as to oppose for legitimate reasons the performance of certain processing operations and, in any case, those carried out for marketing purposes.
- **Security:** the Gerosa Group companies, in order to ensure the protection of personal data, aimed at preventing the risks of loss, destruction or unauthorised access to the same, will adopt the appropriate technical and organisational measures to guarantee a level of security appropriate to the risk, in accordance with the laws in force and company policies.
- **Traceability and identification of processing operations and assets:** Gerosa Group companies will create and maintain up-to-date registers identifying the processing activities carried out and an inventory of the assets used for processing personal data, in compliance with applicable regulations.
- **Accountability and data protection by design and data protection by default:** all Gerosa Group companies will ensure an analysis of all internal initiatives in order to comply with the principles set out in this policy.
- **Responsibility:** Gerosa Group companies will designate an internal function responsible for implementing, applying and monitoring the principles of this policy.

The Gerosa Group companies will adopt organisational and technical measures in order to comply with the aforementioned principles and legal obligations under current data protection regulations

5. Monitoring

The Supervisory Board and the internal control function designated by the Companies belonging to the Gerosa Group periodically assess compliance with the principles set out in this Policy and the adequacy of the existing control structures.

6. Communication of violations

The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

7. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

PERSONAL DATA PROTECTION POLICY

WHISTLEBLOWING POLICY



Version	Date	Description	Approval
V.0	22/05/2023	First group issue	



WHISTLEBLOWING POLICY

1. Objective

The purpose of this policy is to establish the principles and guidelines to be followed in order to report unlawful conduct, whether commission or omission, which constitutes or may constitute a violation, or inducement to violate, the laws and regulations in force as well as the ethical principles of the Gerosa Group.

The Gerosa Group has adopted a specific procedure in order to properly handle reports received in compliance with applicable regulations.

2. Scope of application

This policy applies to all human resources of the Gerosa Group and its external interlocutors, and is therefore addressed to Directors, Management and Control Bodies, Employees, Consultants, Suppliers, Customers, Collaborators, third parties operating on behalf of and/or in the name of the Company.

3. Definitions

Reporting: this consists of the written or oral communication of possible unlawful conduct, commission or omission which constitutes or may constitute a violation, or inducement to violate, the laws and regulations in force as well as the ethical principles of the Gerosa Group.

Retaliation: any omission or act, direct or indirect, occurring in a work context as a result of the report that causes or may cause unjustified harm to the reporting person

Good faith: it consists in the belief that there is a potential breach of the Gerosa Group's principles and/or that unlawful conduct has taken place.

Direct superior: is the employee's direct superior, the one who gives operational instructions.

4. Principles of Conduct

Recipients of this Policy who detect or become aware of possible unlawful conduct or violations of the Gerosa Group's ethical principles are required to report in good faith and promptly to the Supervisory Board or to the internal control function the facts, conduct and circumstances that have caused such violations using the channels specifically implemented by the Group. The Gerosa Group will handle reports received in compliance with the applicable legislation.

Reports must be circumstantiated and made with a wealth of details, providing all useful elements (generalities, facts, times, places, etc.) to enable the Supervisory Board or the internal control function to carry out the due and appropriate checks and verifications to verify the facts reported.

The Gerosa Group accepts anonymous reports and will not tolerate any kind of retaliation against the person who has made the report in good faith and/or against persons linked to him/her (e.g. family members, friends, work colleagues, etc.), reserving the right to take appropriate action against anyone who carries out, or threatens to carry out, acts of retaliation against those who have made reports and/or persons linked to them. However, the Gerosa Group may take the disciplinary and/or legal measures it deems appropriate to protect its rights, property and image against persons who, in bad faith, have made false, unfounded or opportunistic reports and/or for the sole purpose of slandering, defaming or causing prejudice to the person reported or to other persons.

The Gerosa Group recognises the possibility for the reporting party to make any communications it deems appropriate to the competent Public Authorities, guaranteeing the same level of protection and safeguard provided for internal reports.

Communication channels

WHISTLEBLOWING POLICY

Any alleged unlawful conduct or breach of the Gerosa Group's ethical principles by one of the addressees of this policy must be reported through one of the channels implemented by the Gerosa Group, namely:

- Report verbally or in writing to the hierarchical superior, who shall immediately inform the Supervisory Board or the internal control function of the company to which he or she belongs.
- Reporting by e-mail, to the e-mail address of the Supervisory Board or to the internal control function of the relevant company.
- Report through the appropriate form in the 'whistleblowing' section of the <http://www.gerosagroup.com> website.

Recipients may consult their company's Human Resources Department or direct superior for any clarifications regarding the enabled communication channels to be used.

Report Management

All reports received through any of the reporting channels will be analysed by the Supervisory Board or the internal control function of the relevant company, which will confirm receipt of the report and provide information regarding the progress of the investigation and the final outcome, in accordance with the group procedure and applicable laws.

Evaluation and Resolution

All reports received will be investigated by the Supervisory Board or the internal control function of the relevant company in such a way as to ensure the utmost confidentiality, with the assistance of Human Resources or other relevant departments. The Supervisory Board or the internal control function of the Company will be responsible for resolving the case in accordance with the applicable law and group procedure.

Confidentiality, anonymity and prohibition of retaliation

The Gerosa Group admits anonymous reports and has adopted a specific channel for anomalous reports (form in the 'whistleblowing' section of <http://www.gerosagroup.com>). Notwithstanding this, the Gerosa Group recommends that the reporter identify himself or herself in order to quickly resolve the case.

All reports received shall be treated confidentially and the Gerosa Group shall adopt appropriate organisational and technical measures to ensure the confidentiality of the data communicated by limiting access to the content of reports to authorised personnel only.

The Gerosa Group does not tolerate any kind of retaliation against the person who has made the report in good faith or against persons linked to him/her (family members, friends, colleagues, etc.). Any person who retaliates against a whistleblower in good faith will be subject to disciplinary action and will be considered a breach of contractual obligations.

Data protection

The Gerosa Group guarantees that reports will be handled in compliance with data protection regulations. In this respect, the reporter will be informed about the processing of his or her personal data, the principles of data protection and the data subject's rights recognised by the applicable legislation will be guaranteed.

5. Monitoring

The Supervisory Board or the internal control function designated by the Companies belonging to the Gerosa Group periodically assesses compliance with the principles set out in this Policy and the adequacy of the existing control structures.

WHISTLEBLOWING POLICY

6. Communication of violations

The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

7. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS POLICY



Version	Date	Description	Approval
V.0	28/07/2023	First group issue	

INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS POLICY

1. Objective

The purpose of this policy is to ensure compliance with the regulations protecting copyrights and intellectual property rights by Gerosa Group companies and to define the behavioural guidelines necessary to avoid infringements of these regulations.

2. Scope of application

This policy applies to all employees of the Gerosa Group and to suppliers and business associates (the 'Suppliers') involved in business relations, whether as individuals or in the form of a company, with the Gerosa Group.

1. Definitions

Industrial property means all industrial property rights, within the meaning of the legislation applicable to Gerosa Group companies, including, without limitation, patents and models, trade secrets, designs, know-how (e.g. technical product and process information, drawings, software, documentation, manufacturing techniques, etc.) and trademarks.

Copyright is the area of law that protects intellectual works of a creative nature relating to science, literature, music, figurative arts, architecture, theatre, cinematography, broadcasting and, lastly, software and databases.

2. Principles of Conduct

The Gerosa Group is committed to protecting its own and others' intellectual property rights.

Proprietary rights to knowledge developed by the Gerosa Group belong to the Group, which has the right to use it as such in accordance with applicable laws.

Each employee is required to actively contribute, within the scope of his or her functions and responsibilities, to the safeguarding and management of intellectual property by ensuring its development and protection. Furthermore, Gerosa Group employees, suppliers and business associates may not use Gerosa Group and Gerosa Group Clients' intellectual property for personal purposes.

Furthermore, Gerosa Group employees, suppliers and business associates may not use Gerosa Group and Gerosa Group Clients' intellectual property for personal purposes.

Specific rules of conduct:

Photographs, images, music, videos and written texts

The Gerosa Group does not allow its employees to download and/or use through company computer tools images, photographs, written texts, music, videos, software, brand images, texts (for example, reproduction of literary or scientific works, etc.) and other content covered by copyright. Group companies implement appropriate organisational and technical measures to make this restriction applicable.

If it is necessary to use third party software, patents and know-how, images, photographs, videos and/or texts, etc. to carry out work activities, employees must make a request in writing to the relevant Company Department, IT for software, Research and Development for patents and know-how, Marketing for images, photographs, videos, which must verify compliance with intellectual property rights. Where images, photographs and videos include natural persons, the IT Department will inform the internal function responsible for privacy so that the necessary safeguards can be put in place to ensure compliance with data protection legislation.

INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS POLICY

Authorisation for the use of software, images, photographs, music and videos (in particular those in which natural persons are depicted) must always be documented by means of written confirmation by the owner, e.g. by signing a contract (physical or web), unless the said contents are not covered by copyright.

Patents and industrial models, intellectual works, trade secrets, distinctive signs, designs, know-how and/or trade marks

The Gerosa Group respects the industrial property rights of third parties with which it cooperates. In this sense, all employees must refrain from altering or counterfeiting patents and industrial models, intellectual works, trade secrets, distinctive signs, designs, know-how and/or trade marks in any way, and from using altered or counterfeited patents and industrial models, intellectual works, trade secrets, distinctive signs, designs, know-how and/or trade marks or for personal purposes. The companies of the Gerosa Group implement appropriate organisational and technical measures aimed at ensuring that only authorised personnel can have access to content covered by their own and/or third parties' industrial property rights and avoid disclosure or unauthorised use.

If it is necessary to use a trade mark, distinctive signs, designs and models of third parties for marketing purposes, employees must make a request in writing to the IT Department of the relevant company. Authorisation for the use of patents and industrial models, intellectual property, trade secrets, distinctive signs, designs, know-how and/or trade marks must always be documented by confirmation by the owner.

By accepting the Suppliers' Code of Conduct, Suppliers undertake to protect their own and others' industrial property rights (trademarks, patents, distinctive signs, designs, industrial models, intellectual works, etc.). It is therefore forbidden to counterfeit or alter trademarks or distinctive signs, national or foreign, of industrial products, or patents, industrial designs or models, national or foreign, just as it is forbidden to use, introduce into the State, hold for sale, put on sale, otherwise put into circulation, manufacture or industrially use counterfeit or altered objects or other goods, made by usurping industrial property rights or in violation thereof.

3. Monitoring

The Supervisory Board or the internal control function designated by the Companies belonging to the Gerosa Group periodically assesses compliance with the principles set out in this Policy and the adequacy of the existing control structures.

4. Communication of violations

The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

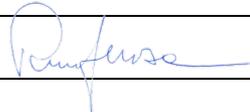
5. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS POLICY

ANTITRUST POLICY AND TRADE COMPLIANCE



Version	Date	Description	Approval
V.0	28/07/2023	First group issue	

ANTITRUST POLICY AND TRADE COMPLIANCE

1. Objective

The purpose of this policy is to ensure compliance by Gerosa Group companies with the regulations protecting free competition and the rules governing trade (imports and exports) between two or more countries, and to define the principles of conduct to be followed by the recipients in order to manage the risks of non-compliance with fiscal regulations.

2. Scope of application

This policy applies to all employees of the Gerosa Group and to suppliers and business associates (the 'Suppliers') involved in business relations, whether as individuals or in the form of a company, with the Gerosa Group.

3. Principles of Conduct

The Gerosa Group undertakes to respect the rules on free competition and the rules governing trade (imports and exports) between two or more countries.

Furthermore, Gerosa Group employees, suppliers and business associates may not use Gerosa Group and Gerosa Group Clients' intellectual property for personal purposes.

- Carrying out business activities in total autonomy and independence from competing companies, operating exclusively on the basis of one's own strategic and commercial choices.
- Respect the principles of free competition, do not fix prices for the sale of products with competing companies and do not engage in conduct that may prejudice free competition such as:
 - enter into both horizontal (between competitors) and vertical (between entities operating at a different level of the distribution chain) agreements with two or more undertakings that consist of agreements or decisions intended to restrict their conduct in the market and that have as their object or effect the prevention, restriction or distortion of competition in the market;
 - exchange confidential information with its competitors except to the extent permitted by applicable law and on the basis of confidentiality agreements entered into in advance between the parties concerned.
- In the event of exportation and/or importation of goods, the employees of the commercial area of the Group Companies with the support of the relevant corporate functions shall check the existence of any sanctions, limitations or restrictive measures against the goods to be imported and/or exported, the country of origin and/or destination and the supplier and/or customer in order to ensure compliance with the regulations governing international trade before carrying out the transaction. In the event of doubts concerning the classification of goods to be imported and/or exported, the counterparty, the country of origin and/or destination, or in the event of particularly complex issues, the relevant corporate functions shall seek the support of external consultants of proven professionalism and/or subject the transaction to a trade compliance screening process.
- Always make written agreements with customs agents.

It is the responsibility of the Head of the Commercial Area of the Gerosa Group Companies to implement and apply the principles of this policy.

4. Monitoring

The Supervisory Board or the internal control function designated by the Companies belonging to the Gerosa Group periodically assesses compliance with the principles set out in this Policy and the adequacy of the existing control measures to manage the risk of corruption.

ANTITRUST POLICY AND TRADE COMPLIANCE

5. Communication of violations

The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

6. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.

ANTITRUST POLICY AND TRADE COMPLIANCE

SUSTAINABILITY POLICY



Version	Date	Description	Approval
V.0	28/07/2023	First group issue	

SUSTAINABILITY POLICY

1. Objective

This Sustainability Policy defines the principles and values on which the Gerosa Group's sustainability strategy is based and which guide the decision-making process in the field of environmental, social and governance issues.

2. Scope of application

This policy applies to all employees of the Gerosa Group and to suppliers and business associates (the 'Suppliers') involved in business relations, whether as individuals or in the form of a company, with the Gerosa Group.

3. Principles of Conduct

The Gerosa Group considers sustainability to be one of the Group's core values. The sustainability principles that the Gerosa Group pursues are:

Integrity, responsibility and transparency

Integrity, responsibility and transparency constitute some of the general principles on which the Gerosa Group's Code of Ethics and the conduct of its activities are based. The Group is committed to operating according to these principles, through organisational and business conduct models consistent with international and national best practices.

To this end, the Group has procedures, monitoring tools and rules of conduct designed to minimise any form of unethical conduct or corruption and to counter any kind of illegal practice.

Stakeholder dialogue

The Gerosa Group is aware that it must also operate in the interest of all stakeholders and the community at large. In this sense, Group companies have the task of promoting, in the most appropriate forms, dialogue with stakeholders relevant to the companies.

In order to guarantee and maintain an open dialogue with the local communities with which the Group's companies maintain contact and with all the stakeholders with whom it deals, the Gerosa Group is committed to interacting with all stakeholders through a proactive approach, with the aim of creating shared value and implementing a culture of sustainability. The Group is also committed to assessing the economic, environmental and social impacts generated by its activities in the communities in which it operates, promoting the growth and enhancement of the territory.

Involvement and communication of results to stakeholders includes the annual publication of the Sustainability Report or Report.

Value of human capital

As specified in the Group's Code of Ethics, people represent the Group's human capital, and as a central element of the company's activities, they are individuals to be valued with rights to be respected. To this end, the Group promotes programmes and activities aimed at establishing a more collaborative approach among employees.

One of the Group's founding values is worker health and safety, and Group companies develop targeted information and awareness campaigns among all employees and collaborators. The importance of protecting the health and safety of people is referred to in the Code of Ethics and required of suppliers through the Supplier Code of Conduct. Gerosa Group companies take appropriate and adequate measures to guarantee the health and safety of people.

SUSTAINABILITY POLICY

Respect for the environment

Protection of the environment and ecosystems are core values of the Gerosa Group. In this sense, the Group is committed to the progressive integration of renewable sources in its activities, the reduction of greenhouse gas emissions into the atmosphere and the safe use of chemicals in order to safeguard ecosystems and biodiversity. Gerosa Group companies take appropriate and adequate measures to minimise the environmental impact of packaging.

The Gerosa Group promotes the development of environmentally friendly products and the use of sustainable materials.

The Gerosa Group requires its suppliers to adopt suitable and adequate measures in order to protect the environment and manage chemicals throughout the supply chain, in compliance with applicable regulations. The raw materials used by the supplier must meet the requirements of quality, safety, environmental protection and sustainability. The supplier will take appropriate and adequate measures to minimise the environmental impact of packaging.

Non-discrimination, inclusion, equal opportunities and protection of human rights

The Gerosa Group promotes an inclusive, fair and sustainable approach to people management through its commitment to ensuring respect for human rights, equal opportunities and the prohibition of any form of discrimination. To this end, the Group has adopted a Code of Ethics, a Supplier Code of Conduct and policies requiring its employees and the supply chain to respect these values.

In order to ensure uniformity in sustainability issues, the Gerosa Group has defined the following principles of conduct to be pursued by Gerosa Group companies:

- Business decisions should be guided by the sustainability principles specified in this policy. The Gerosa Group's primary goal is to minimise environmental impacts and optimise the use of energy and natural resources.
- The selection of suppliers and the purchase of goods and services are carried out on the basis of objective evaluations concerning competitiveness, quality, affordability, safety and sustainability.
- The raw materials used by the Gerosa Group must meet quality, safety, environmental protection and sustainability requirements.
- Appoint a Group Sustainability Officer to assess compliance with sustainability principles and prepare the Sustainability Report.

4. Monitoring

The Gerosa Group's Head of Sustainability periodically assesses compliance with the principles set out in this Policy and the adequacy of the existing control mechanisms.

5. Communication of violations

The addressees of this Policy are required to report in writing, in good faith and on the basis of reasonable factual elements to their direct superior and/or to the Supervisory Board or internal control function of each Company, violations and/or conduct not compliant with this Policy, following the instructions defined in the reporting management procedure adopted by the Gerosa Group.

6. Disciplinary sanctions and contractual responsibilities

Failure to comply with this Policy may, depending on the severity or frequency of such a violation, result in heavy penalties and potential criminal liability for the Company, management and workforce involved. In addition, personnel involved in non-compliance are subject to disciplinary sanctions. The Gerosa Group may take measures, including but not limited to contract termination and claims for damages against Business

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Partners, suppliers and third parties with whom a business relationship is maintained whose actions are found to be in breach of the Code of Ethics, Supplier Code of Conduct and this Policy.