

CODE OF ETHICS

ZUEGG

Document approved by the Board of Directors of Zuegg S.p.A. on December 11, 2024

Chairman of the Board of Directors Oswald Zuegg

References in the Code of Ethics to "ZUEGG" or "Company" or "Business" refer to the company
ZUEGG S.p.A.

INTRODUCTION

Ethics in business is a fundamentally important approach to the proper operation and credibility of a company towards shareholders, customers, and suppliers, and, more generally, towards the entire economic environment in which it operates. ZUEGG S.p.a. has long since embarked on a journey aimed at pursuing a quality policy, as well as an environmental and safety policy, adopting a Quality Management System according to UNI EN ISO 9001:2000 standards, and an Environmental and Safety Management System according to UNI EN ISO 14001:2000 standards, the UNI INAIL Guidelines, and the "Safe Work" Operational Guide. ZUEGG S.p.a. It is an Italian company operating in the fruit processing sector. Over the years, it has chosen to expand abroad, with production facilities (in France, Germany and Russia) and sales facilities (in Switzerland and Austria), giving rise to the Zuegg Group.

The Company intends to transform its knowledge and appreciation of the ethical values it adheres to into a competitive advantage. The Board of Directors of ZUEGG S.p.A. has therefore decided to adopt this Code of Ethics and Conduct (hereinafter the "Code of Ethics" or "Code"), which aims to confirm and establish in a single document the principles of fairness, loyalty, integrity, and transparency in conduct, operating methods, and relationships both internally and with third parties. The "Recipients" of the Code of Ethics are those who work for ZUEGG S.p.A.: employees, members of the Board of Directors, Statutory Auditors, as well as internal and external

collaborators who contribute to the achievement of the Company's objectives within the scope of its management and supervision.

These individuals are therefore required to be familiar with the contents of the Code of Ethics and to contribute to its implementation and dissemination of the principles developed therein. The company promotes the dissemination of its Code of Ethics also to those with whom it has business relationships, consistent with the manner and content of such relationships. The rules contained in the Code of Ethics integrate the conduct that Recipients are required to observe pursuant to applicable civil and criminal laws, regulations, and obligations under collective bargaining agreements. Recipients of the Code of Ethics who violate its rules undermine the relationship of trust with the Company and will be subject to the applicable sanctions. The application of the Code of Ethics is entrusted to the Chief Executive Officer, who avails himself of the Supervisory Body established pursuant to Legislative Decree 231/2001 (hereinafter the "Supervisory Body"). The principles and content set forth in this Code of Ethics are also binding on companies belonging to the Zuegg Group, which must adopt their own code of ethics that reflects these principles and content, in compliance with applicable local regulations.

I. GENERAL PRINCIPLES

Recipients of this Code of Ethics must adhere, within their scope of responsibility, when carrying out activities in the interest or for the benefit of the Company, to the following guiding principles:

- act in an informed manner in compliance with the laws and regulations in force in Italy and, as applicable to individual conduct, in other countries in which ZUEGG S.p.a. operates;
- Treat customers, shareholders, employees, suppliers, the surrounding community and the institutions that represent it, including any public official or provider of a public service, as well as any third party with whom one enters into a professional relationship, with honesty, fairness, impartiality, and without prejudice;
- Compete fairly in the market with competitors;
- Protect one's own health and safety and that of others;
- Monitor and, where appropriate, minimize the potentially harmful effects of activities on the environment;

- Maintain the confidentiality of information regarding the Company, its know-how, employees, customers, and suppliers;
- Operate according to the principle that every operation or transaction must be correctly recorded, authorized, verifiable, legitimate, consistent, and appropriate;
- Avoid or declare in advance any conflicts of interest with the Company;
- Collect and process personal data in compliance with the law and the principles of legality, necessity, and proportionality;
- Use the Company's intellectual and material assets, including IT tools, in compliance with general regulations and their intended use and in a manner that protects their conservation and functionality, avoiding their use in violation of any legal provision;
- Respect the UN Universal Declaration of Human Rights, the international labor conventions and recommendations issued by the ILO (International Labour Organization), the Earth Charter drafted by the Earth Council, and the principles set forth in the Global Compact proposed by the UN.

II. BEHAVIOR in BUSINESS MANAGEMENT

All actions and transactions of the entity must be adequately recorded, and it must be possible to verify the decision-making, authorization, and execution processes. Adequate documentation must be available for each transaction to enable, at any time, checks to certify the characteristics and reasons for the transaction and identify who authorized, performed, recorded, and verified the transaction. The Company is committed to ensuring the traceability of financial flows to and from outside and the traceability of payments, particularly to customers, suppliers, and external consultants. The Company avoids entering into business relationships with third parties whose involvement in criminal or terrorist activities is proven or even reasonably suspected.

A) Stakeholder Relations

ZUEGG S.p.A. considers the ethical conduct of its business activities to be its primary objective; the Company is aware that the proper pursuit of this primary objective results in the creation of value for its shareholders and, more generally, for all stakeholders, meaning all entities, public or private, Italian or foreign—individuals, groups, companies, institutions— who have any contact with and/or

have an interest in the activities of the Company. Each director, employee, and collaborator will therefore direct their actions toward the pursuit of this objective. It is in ZUEGG S.p.A.'s interest to establish an ongoing dialogue with its shareholders. Relations with shareholders are maintained by the designated corporate functions, in compliance with the rules and procedures regarding the communication of documents and information concerning the Company.

B) Customer/Consumer Relations

ZUEGG S.p.a. focuses its business on customer satisfaction and protection, paying attention to requests that can improve the quality of its products and services. For this reason, ZUEGG S.p.a. directs its research, development, and marketing activities to high quality standards for its products and services. In its customer relations, ZUEGG S.p.a. ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as the correct and diligent fulfilment of contractual obligations, particularly ensuring that the products and services provided possess all the characteristics and qualities promised and declared to customers. In the spirit of a collaborative and highly professional relationship, availability, respect, and courtesy must be ensured. In conducting business with customers, the Recipients of the Code of Ethics must apply conditions appropriate to each type of customer. Under no circumstances should a customer be preferred over another based on personal relationships, favouritism, or advantages other than those of the exclusive interest and benefit of the Company.

In conducting any negotiation, situations in which the parties involved in the transactions are or may appear to be in a conflict of interest must always be avoided. Recipients are required to provide complete, comprehensible information to Customers, in accordance with the applicable regulations.

A) Relationships with Suppliers

Relationships with the Company's suppliers, including financial and consulting relationships, are subject to the principles contained in this Code and are subject to constant and careful monitoring by the Company itself. The Company uses suppliers who operate in compliance with applicable legislation and the rules set forth in this Code. The selection of suppliers and the determination of purchasing conditions must be based on an objective assessment of the quality and price of the goods and services offered, and the ability to promptly provide and guarantee goods and services of a level adequate to the Company's needs. Under no circumstances should one supplier be preferred over another based on personal relationships, favouritism, or advantages other than

those of the Company's exclusive interest and benefit. In particular, suppliers of machinery and equipment must also be selected based on the compliance of the supplies with occupational health and safety regulations. The supplies of personal protective equipment and, in any case, general safety and prevention equipment will comply with certification and suitability requirements, both general and specific, for the intended use. Before outsourcing activities to be performed within the company or within its production cycle, whether under procurement, work, or supply contracts, the third party's technical and professional suitability is verified, thereby complying with the specific legal obligations regarding occupational health and safety.

The Company undertakes not to establish or maintain business relationships with suppliers who employ child labor or illegal labor or unlawful working conditions.

B) Employee Relations

Human resources are an essential factor for the existence, development, and success of a business. For this reason, ZUEGG S.p.a. protects and promotes the value of human resources with the aim of improving and increasing the wealth and competitiveness of the skills possessed by each employee within the Company's organizational context. ZUEGG S.p.a. undertakes not to exploit, even indirectly, forced and compulsory labour or child labour. The Company guarantees workers' freedom of association and recognizes the right to collective bargaining. ZUEGG S.p.a. offers equal opportunities to all employees based on their professional qualifications and individual capabilities, without any discrimination based on religion, race, political or trade union affiliation, or gender. Therefore, the Company, through the relevant departments, selects, hires, compensates, and organizes employees based on merit and competence, in compliance with the current collective bargaining agreement and the adopted reward system, which is based on criteria of objectivity and reasonableness. The work environment, in addition to being adequate for the safety and personal health of employees, fosters mutual collaboration and team spirit, respecting the moral personality of each individual, and is free from prejudice, intimidation, unlawful influence, or undue discomfort. Employees/Collaborators operate according to the highest standards of quality and hygiene, in compliance with the rules defined in this Code of Ethics and the operating procedures defined in the certified management systems. In particular, Employees/Collaborators are required to know and implement the provisions of company policies regarding information security and to guarantee integrity, to operate diligently in order to protect company assets, using them sparingly and scrupulously, and to report any improper use. All individuals acting in the name and interest of the

Company, and who find themselves with an interest currently or potentially in conflict with that of the Company, must refrain from taking any action in this regard and must report the existence of the conflict to their direct superior or another corporate function, so that they can carry out the appropriate assessments, such as, for example, indicating another manager or collaborator who is not in the same conflict situation. In any case, the conflict of interest and the decisions taken in this regard must be notified to the top management of the Administrative Body.

C) Relations with Competitors

The Company believes in free and fair competition and bases its actions on achieving competitive results that reward skill, experience, and efficiency. The Company and its employees must conduct themselves correctly in matters of interest to the Company and in relations with the Public Administration. Any action aimed at altering the conditions of fair competition is contrary to the Company's corporate policy and is prohibited for anyone acting on its behalf. Under no circumstances may the pursuit of the Company's interests justify conduct by the Company's management or employees that does not comply with applicable laws and the rules of this Code. In all external communications, information regarding the Company and its activities must be truthful, clear, and verifiable.

D) Relations with Public Administration

In its relations with the Public Administration, ZUEGG S.p.a. pays particular attention to every action, behaviour, or agreement, ensuring that they are characterized by maximum transparency, correctness, and legality. To this end, ZUEGG S.p.a. will avoid entrusting the entire process to a single individual, on the assumption that multiple individuals and roles minimize the risk of interpersonal relationships that are inconsistent with the Company's intentions. Furthermore, to the extent possible, in inspection and authorization relationships, ZUEGG S.p.a. will favour multiple company interlocutors, again on the assumption that this minimizes the aforementioned risk. During business negotiations, requests, or commercial relations with the Public Administration, direct or indirect behaviours that could improperly influence the other party's decision will not be adopted. Specifically, it is prohibited to examine or propose employment and/or business opportunities that could benefit public administration employees personally, or solicit or obtain confidential information that could compromise the integrity or reputation of either party. When conducting business relationships, the provisions of the contract must be respected, avoiding unauthorized substitutions and establishing adequate control and safeguard mechanisms, and only

using the collaboration of competent and appropriate individuals. If the Company uses a consultant to represent or provide technical-administrative assistance in its relations with the Public Administration, the same guidelines that apply to Company employees shall apply to such individuals and their staff. Furthermore, in selecting such consultants, the Company will prioritize criteria of professionalism and fairness, excluding anyone who has, or has recently had, an organic or dependent relationship with the Public Administration, even indirectly through a third party or close family ties. All requests for grants, contributions, financing, or tax relief from public, national, or EU bodies must be submitted in compliance with applicable regulations and in accordance the principle of separation of duties, registration, and documentation; once granted, they may only be used for the purposes for which they were originally intended.

E) Gifts, gratuities, and benefits

Any form of gift that could be interpreted as exceeding normal commercial or courtesy practices, or in any case intended to obtain preferential treatment in the conduct of any activity related to the Company, is prohibited. Specifically, any form of gift to Italian or foreign public officials, or their family members, that could influence their independence of judgment or induce them to secure any advantage, is absolutely prohibited. Please note that this rule applies to both promised or offered gifts and those received, with a gift being defined as any type of benefit (free participation in conferences, the promise of a job offer, a prize related to business trips, etc.). Gifts offered to third parties, in any case not belonging to the Public Administration, given the absolute prohibition mentioned above, must be of modest value and adequately documented and authorized to allow for appropriate verification. Recipients of this Code of Ethics who receive gifts or benefits of a non-modest value, or receive solicitations for payments from public officials or providers of a public service, customers/suppliers, or any other third parties, are required to notify the Supervisory Body established pursuant to Legislative Decree 231/2001, which will assess the appropriateness and, where necessary, will ensure that the sender is notified of the Company's policy on the matter.

F) Marketing and Communication

ZUEGG S.p.a. ensures the necessary conditions for its products to contribute to a natural diet. However, nutrition, beyond being a biological factor, is profoundly linked to the cultural identity of individuals. Therefore, all marketing activities must be conducted with full respect for the different customs and values regarding the production and consumption of food. ZUEGG S.p.a. considers the purchasers of its products as true "interlocutors": "people" who have the right to receive all the

information necessary to make an informed choice when purchasing, and not just as simple "consumers" of the product.

ZUEGG S.p.a.'s communications, therefore,

- will always respect the centrality of the "person" with their entire complex system of physical, psychological, cultural, and emotional needs: market logic will not be an obstacle to full transparency regarding the content and correct use of products;
 - will reject vulgar, contradictory, uncertain, or ambiguous messages;
 - will always be aware of its responsibility to influence people's choices,
- guaranteeing the quality of the relationship between the company and its people.

III. HEALTH, SAFETY, ENVIRONMENT

A) Health, hygiene, and safety at work.

The Company operates, at all levels, to ensure the physical and moral integrity of its employees, working conditions that respect individual dignity, and safe and healthy work environments, in full compliance with applicable legislation. The Company assesses all risks to worker health and safety, including in the choice of work equipment and the chemical substances or preparations used, as well as in the design of workplaces. It carries out its activities under technical, organizational, and economic conditions that ensure adequate accident prevention and a healthy and safe work environment. Every corporate decision, at all levels and types, regarding occupational health and safety must take into account the following fundamental principles and criteria:

- avoid risks;
- assess unavoidable risks;
- combat risks at source;
- adapt work to the individual—particularly with regard to the design of workplaces and the choice of equipment and work and production methods— particularly to reduce monotonous and repetitive work and to reduce the effects of such work on health;

- take into account the level of technological development;
- replace what is dangerous with what is not or less dangerous;
- give priority to collective protection measures over individual protection measures.

The company plans prevention, aiming for a coherent whole that integrates technology, organization, working conditions, social relations, and the influence of factors in the work environment. The Company is committed to disseminating and consolidating a culture of safety among all its employees, developing risk awareness and promoting responsible behaviour by all employees, including through the provision of appropriate instructions. The Recipients of this Code, and in particular the Employer and its delegates, Managers, Supervisors, Workers, the Head of the Prevention and Protection Service, the Occupational Physician, and the Workers' Safety Representative, contribute to the process of risk prevention and health and safety protection for themselves, their colleagues, and third parties, without prejudice to their individual obligations and responsibilities pursuant to the applicable legal provisions. Within the scope of company activities, there is a general prohibition on the use of alcohol or narcotics. Smoking is also prohibited in the workplace - in accordance with the law – and in any circumstance where smoking could pose a risk to company facilities and property or to the health or safety of colleagues and third parties.

B) Product Safety

Product safety has always been one of ZUEGG S.p.a.'s core values. The company develops and manufactures its own products to offer food products that contribute to a natural diet, not only to meet functional and aesthetic requirements, but also in compliance with the strictest regulations regarding safety, quality, respect for the environment, and the dignity of individuals.

C) Environmental Protection.

The environment is a primary community asset that ZUEGG S.p.a. wishes to help protect. To this end, it plans its activities by seeking a balance between economic initiatives and environmental needs, in compliance with applicable laws and regulations, providing full cooperation with the public authorities responsible for monitoring, surveillance, and environmental protection. The Recipients of this Code contribute to the process of environmental protection. In particular, those involved in production processes must pay the utmost attention to avoid any illegal discharge and emission of harmful materials and treat any waste or processing residues deemed at risk according to specific requirements. When the Company promotes, plans, or commissions the planning of

construction projects, it carries out or ensures that all necessary investigations are carried out, among other things, to assess the potential environmental risks arising from the project and prevent damage.

IV. PROCESSING OF INTERNAL INFORMATION AND PERSONAL DATA

The processing of information and data, including personal data, that the Company becomes aware of in the performance of its business activities, is carried out in full compliance with the law, confidentiality, and the proper processing of data subjects' data. The processing of data and information ensures the separation of roles and responsibilities; any third parties involved in the processing of information are bound by a confidentiality agreement. All data, information, and other material obtained by Recipients of this Code of Ethics in connection with their employment or professional relationship is strictly confidential and remains the property of the Company. Such information may concern current and future activities, including news not yet disclosed, information, and announcements, even if soon to be released. Those who, by virtue of the performance of a function, profession, or office, have access to inside information regarding the Company (for example, information regarding management changes, acquisition, merger, spin-off plans, strategic plans, budgets, business plans), may not use such information for their own benefit and/or that of family members, acquaintances, and third parties in general, but exclusively for the performance and within the scope of their office or profession. They must also take particular care not to divulge inside information and to avoid any improper use of such information. Even information and/or any other type of news, documents, or data that are not in the public domain and are connected to the acts and operations specific to each job or responsibility must not be disclosed, used, or even communicated for other purposes without specific authorization and consent.

In any case, confidentiality is desirable regarding information concerning the Company and its work or professional activities. The disclosure of information to external parties must be carried out by the competent company functions and in any case in compliance with the law, transparency, and truthfulness. In particular, all information to the Public Administration must be truthful, correct, transparent, and complete, and must be produced and disclosed according to company organizational procedures and related authorization flows. The company pursues the protection of

data, company information, and technical industrial experience, including commercial information and tests; therefore, all recipients are prohibited from revealing the aforementioned information and experience to third parties unless it is, in its entirety, or in the precise configuration or combination of its elements, known to the public or easily accessible to experts and industry professionals.

The following principles must be respected in processing activities:

- accountability;
- transparency;
- limitation of collection;
- purpose of use;
- verifiability and quality;
- security.

V. USE OF IT RESOURCES

IT and telematics resources are a fundamental tool for the proper and competitive operation of the company, ensuring the speed, breadth, and accuracy of the information flows necessary for the efficient management and control of company activities. All data and information residing in the company's IT and telematics systems, including email, are the property of ZUEGG S.p.a. and must be used exclusively for the performance of company activities, in the manner and within the limits indicated by the Company. Also to ensure compliance with data processing and privacy regulations the correct and limited use of IT and telematics tools is pursued, avoiding any use aimed at collecting, archiving, and disseminating data and information for purposes other than the Company's business. The use in company operations of any computer or electronic program for which copyrights are held by third parties and which has not been previously licensed to the company is prohibited. The use of computer and electronic tools is subject to monitoring and verification by the Company, as required by law, in order to prevent any behaviour that violates legal and regulatory obligations.

VI. ACCOUNTING BOOKS AND CORPORATE REGISTERS

The Company accurately and completely records all corporate activities and transactions, in order to achieve maximum accounting transparency towards shareholders and external bodies and prevent the appearance of false, misleading, or deceptive entries. Administrative and accounting activities are carried out using up-to-date IT tools and procedures that optimize efficiency, accuracy, completeness, and compliance with accounting principles, as well as facilitate the necessary controls and audits of the legitimacy, consistency, and appropriateness of the decision-making, authorization, and execution of the Company's actions and operations. The Company believes that the accuracy and transparency of corporate financial statements are important values; ZUEGG S.p.a. provides full cooperation at all levels, providing correct and truthful information regarding corporate activities, assets, and transactions, as well as any reasonable request received from the competent bodies.

VII. TAX COMPLIANCE

The Company undertakes to perform all tax obligations required by current legislation in a complete and transparent manner and to cooperate, where applicable, with the Financial Administration. Tax returns and tax payments are not only legally mandatory but also unavoidable as part of the company's social responsibility. Any criminal conduct that could result in the Company's criminal involvement pursuant to Legislative Decree 231/2001 is expressly prohibited. Any violation of the prohibitions specified above is absolutely contrary to the Company's interests. The recipients of this Code must not in any way commit or conspire with others to commit criminal violations of tax law.

VIII. CUSTOMS COMPLIANCE

ZUEGG S.p.a. and all its collaborators and employees refrain from introducing, transporting, holding, or exchanging goods in violation of the provisions, prohibitions, and limitations set forth in current legislation, including, but not limited to, the Consolidated Law on Customs Legislative

Provisions. In any case, the principles of traceability, segregation of roles, verifiability, and updating must be observed in order to prevent any conduct that could lead to customs violations.

VIII. CORPORATE CONDUCT

ZUEGG S.p.A. believes that corporate conduct must always be pursued in formal and substantive compliance with the law, protecting the free decision-making of shareholders, maintaining transparent and reliable conduct, including towards creditors, pursuing the integrity of share capital and non-distributable reserves, and collaborating with the authorities responsible for controls and/or audits.

IX. CONFLICTS OF INTEREST

Recipients of the Code of Ethics must avoid all situations and activities in which a conflict of interest may arise between their personal economic activities and the duties they perform within the organization to which they belong. In any case, the Supervisory Board must be notified of situations in which a conflict of interest is believed to exist, even hypothetically, and, in case of doubt, abstain from engaging in the resulting action. Pursuing personal interests to the detriment of corporate interests is prohibited, nor is unauthorized personal use of company assets permitted. Without prejudice to the foregoing, holding direct or indirect interests in competing companies, customers, suppliers, or auditors is prohibited, unless prior notification is given to the Supervisory Board, which will monitor the situation accordingly, informing the Administrative Body where appropriate.

X. IMPLEMENTATION AND CONTROL

In compliance with applicable legislation and with a view to planning and managing corporate activities aimed at efficiency, fairness, transparency, and quality, the Company adopts appropriate organizational and management measures to prevent unlawful conduct or conduct that is in any

way contrary to the rules of this Code by any person acting for the Company. Given the complexity of its activities and internal organization, the Company adopts a system of delegation of powers and functions, explicitly and specifically assigning tasks to individuals with suitable skills and competence. In relation to the scope of delegated powers, the Company adopts and implements organizational and management models that provide suitable measures to ensure that activities are carried out in compliance with the law and the rules of conduct set out in this Code, and to promptly identify and eliminate risk situations. The application of the Code of Ethics is entrusted to the Chief Executive Officer, who avails himself of the Supervisory Body, established specifically pursuant to Legislative Decree 231/2001, which is entrusted with the following tasks:

- a) monitor compliance with the Code and disseminate it to all Recipients;
- b) investigate any reports of violations of the Code and inform the competent corporate bodies and functions of the results of the investigations, for the adoption of any disciplinary measures;
- c) propose amendments to the content of the Code to adapt it to the changing context in which the Company operates and to the needs arising from the Company's evolution.

This Code of Ethics is adequately disseminated to its Recipients.

XI. REPORTING VIOLATIONS OF CORPORATE RULES AND UNETHICAL CONDUCT

(WHISTLEBLOWING)

ZUEGG S.p.a. guarantees, through the adoption of appropriate reporting procedures and channels, the confidentiality of any reports (in whatever form they are expressed) regarding violations of laws and the principles contained in this Code of Ethics, as well as the prohibition of discriminatory or retaliatory acts of any kind against individuals who have filed complaints. Specifically, the Company – in compliance with Legislative Decree 24/2023 – has activated the following internal reporting channel:

REPORTING METHOD	DETAILS
BY EMAIL TO THE DEDICATED ADDRESS	segnalazioni.verona@zuegg.it
BY MAIL TO	Whistleblowing Body c/o ZUEGG S.p.a. Via Francia n. 6 - Verona – Italy With the wording "Reserved for the manager of the report – Whistleblowing Body"

In the case of a paper report (by mail), the report must be placed in two sealed envelopes, including:

- in the first, the reporting person's identification data, along with an identity document (if it is decided not to make an anonymous report);
- in the second, the subject of the report.

Both envelopes must then be placed in a third envelope marked on the outside with the wording "Reserved for the reporting manager - Whistleblowing Body." In accordance with the whistleblowing procedure adopted by the company, the procedures for reporting and verifying violations, also in the interest of investigation, are based on criteria of confidentiality and protection of confidentiality, in order to prevent retaliation of any kind against the reporting person but also to ensure the verification of the actual facts.

XII SANCTIONS

Violation of the provisions of this Code of Ethics, taking into account its severity and possible recurrence, will constitute a disciplinary offense and a breach of contractual obligations of the employment or functional employment relationship or professional collaboration, with all consequent legal and contractual effects, including pursuant to Articles 2104 and 2105 of the Italian Civil Code. It may also constitute just cause pursuant to Articles 2383 and 2400 of the Italian Civil Code. It will therefore entitle the Company to apply the disciplinary sanctions provided for by the National Collective Bargaining Agreement and the Corporate Disciplinary Code, as well as those

provided for by the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, adopted by the company and to which reference should be made for details of the disciplinary system.

XIII. FINAL PROVISIONS

This Code of Ethics is effective immediately from today's date and until revised. All Recipients are required to familiarize themselves with it and comply with it. After a long and in-depth discussion, in which all attendees participated, the Board of Directors

Chairman

Oswald Zuegg