

Code of Ethics

First issue approved by the Board of Directors on 03.18.2025

REV.	DATE	APPROVAL	DESCRIPTION OF THE CHANGES
0.0	03.18.2025		First issue

TABLE OF CONTENTS

0. PREAMBLE	4
1. SCOPE OF APPLICATION OF THE CODE AND DISCIPLINARY SYSTEM	4
2. GENERAL PRINCIPLES AND RULES OF CONDUCT	
2.1 Honesty, moral integrity, fairness, transparency and objectivity	4
2.2 Non-discrimination	4
2.3 Child labour	4
2.4 Value of human resources	4
2.5 Accuracy and transparency of corporate information	5
2.6 Internal control system by the Supervisory Committee	5
2.7 External communications	5
2.8 Transparency and completeness of information	5
2.9 Confidentiality and handling of information	5
2.10 Fair competition	5
2.11 Prevention of conflicts of interest	5
2.12 Gifts, gratuities and benefits	5
2.13 Protection of industrial and intellectual property	5
2.14 Counterfeit parts	5
2.15 Export and marketing of goods	6
2.16 Responsibility towards the community	6
3. RULES OF CONDUCT IN RELATIONS WITH PERSONNEL	6
3.1 Staff recruitment	6
3.2 Establishing the employment relationship	6
3.3 People management	6
3.4 Development and training of resources	6
3.5 Workers' rights: health and safety at work	6
3.6 Workers' rights: privacy protection	6
3.7 Workers' rights: protection of the person	6
3.8 Workers' duties: general conduct	7
3.9 Workers' duties: conflicts of interest	7
3.10 Workers' duties: protection of company assets	7
3.12 Workers' duties: information management	7
4. RULES OF CONDUCT IN RELATIONS WITH CUSTOMERS AND SUPPLIERS	7
4.1 Starting and maintaining business relations	7
4.2 Relations with customers	7
4.3 Contracts and communications to customers	8
4.4 Relations with suppliers	8
4.5 Transparency of the purchasing process	8
4.6 Contract clauses on ethical conduct in supplies	8
5. RULES OF CONDUCT IN RELATIONS WITH PUBLIC ADMINISTRATION	8
5.1 Reference scope	8
5.2 Rules of conduct concerning risks of corruption and extortion	8
5.3 Fairness in business relations with Public Administration	9
5.4 Conduct concerning statements and declarations to Public Administration	9
5.5 Use of contributions and funding received	9
5.6 Data and IT systems relating to Public Administration	9

6. RULES OF CONDUCT IN RELATIONS WITH THE COMMUNITY AND INSTITUTIONS	9
6.1 Social policy	9
6.2 Relations with political parties, trade unions and associations	9
6.3 Institutional relations	9
7. RULES OF CONDUCT FOR ACCOUNTING, ADMINISTRATIVE OR FINANCIAL ACTIVITIES	9
8. RULES OF CONDUCT ON ANTI-MONEY LAUNDERING	10
9. ENVIRONMENTAL PROTECTION	10
10. APPLICATION MECHANISMS OF THE CODE OF ETHICS	10
10.1 Dissemination and communication	10
10.2 Supervision over implementation of the Code of Ethics	10
10.3 Reporting problems or suspected violations	10
10.4 Disciplinary measures for violations	11
11. FINAL PROVISIONS	11

**Eredi Baitelli SpA**

• Via A. de Gasperi, 43 - 25030 Zocco di Erbusco (BS) Italy • Via Costa, 60/E - 25030 Erbusco (BS) Italy
Tel.: +39 030 77 67 811 E-mail: info@eredibaitelli.it www.eredibaitelli.it

0. PREAMBLE

This Code of Ethics is prepared, approved and communicated by the Board of Directors to all stakeholders as the ethical-conduct principles of Eredi Baitelli S.p.A. in carrying out its activities.

In addition to complying with applicable laws and regulations, the Organization intends to observe high ethical standards in the conduct of its daily work. These standards—and their guiding principles—are set out in this Code of Ethics (the “Code”).

The Code complements statutory rules of conduct: mere legal compliance, while essential, is not always sufficient. The Organization requires that all corporate decisions and the conduct of its people be based on ethical rules, even where such rules are not codified by law. “Personnel” refers to all those who work in or for Eredi Baitelli S.p.A.: employees, directors and collaborators of any kind.

The Code expresses the ethical commitments and responsibilities undertaken by those who, in various capacities, contribute to achieving the Organization’s objectives toward: shareholders, employees, collaborators, external consultants, suppliers, customers and other parties—collectively referred to as “stakeholders.” Every person working at Eredi Baitelli S.p.A. must act in accordance with this Code.

Particular attention is required of Management and other Leaders, as well as members of the Supervisory Committee, who must oversee compliance with the Code: they shall ensure constant application of these principles and model exemplary behavior. The Code is available to customers, suppliers and third parties interacting with Eredi Baitelli S.p.A., who are formally invited to comply with its principles and rules of conduct in their dealings with the Company.

1. SCOPE OF APPLICATION OF THE CODE AND DISCIPLINARY SYSTEM

All those working to achieve the Company’s objectives—whether in senior positions (directors, auditors/statutory controllers or persons with managerial and representative functions), or as employees, collaborators, external consultants, suppliers and business partners—must comply with this Code without exception in the conduct of business and corporate activities.

Compliance with the Code is an essential part of the contractual obligations of all such recipients. The Company intends to comply with laws and regulations while aligning actions and conduct with the principles, objectives and commitments of this Code; under no circumstances can the pursuit of Company interests justify improper conduct.

Any behavior contrary to the letter or spirit of the Code will be sanctioned proportionally to the gravity of the violation, in accordance with the disciplinary system. Third-party violations will be sanctioned according to the criteria set out in the relevant contractual clauses.

2. GENERAL PRINCIPLES AND RULES OF CONDUCT

2.1 Honesty, moral integrity, fairness, transparency and objectivity

In their activities and in all relationships, everyone working with and for Eredi Baitelli S.p.A. must diligently comply with applicable laws and regulations in the countries where the Company operates, as well as with this Code and internal procedures. Conduct must reflect honesty, moral integrity, fairness, transparency, objectivity and respect for the individual while pursuing corporate objectives and in dealings with all internal and external parties. No Company interest justifies conduct that is not honest. Eredi Baitelli S.p.A. will suspend any relationship with anyone acting otherwise.

2.2 Non-discrimination

All forms of discrimination must be avoided, especially those based on race, nationality, sex, age, disability, health status, sexual orientation, political or union opinions, philosophical beliefs or religion, toward any internal or external party.

2.3 Child labour

Eredi Baitelli S.p.A. guarantees that child labour is not tolerated in any form. The minimum age for employment must meet or exceed legal and local labour-law requirements.

2.4 Value of human resources

Eredi Baitelli S.p.A. safeguards and promotes the value and development of human resources—key to the Company’s success—to maximize satisfaction and enhance skills. Authority in hierarchical relationships must be exercised fairly and properly; any conduct harmful to the dignity and autonomy of employees/collaborators is prohibited. The Company requires full compliance with labour-law obligations, workplace hygiene and safety, and rights of association and representation as required where it operates.

2.5 Accuracy and transparency of corporate information

Every operation and transaction must be properly executed, recorded, authorized, verifiable, lawful, consistent and appropriate. Each action must be adequately recorded in accounting systems, as required by law and applicable accounting standards, and supported by suitable documentation to allow checks on characteristics, motivations and the identities of those who authorized, performed, recorded and verified the operation. Information flows used for financial statements and tax obligations must ensure a true, complete and transparent representation of the Company's situation.

2.6 Internal control system by the Supervisory Committee

Eredi Baitelli S.p.A. recognizes the importance of an effective internal control system to ensure that business activities align with this Code. The Company provides appropriate organizational and environmental conditions to promote such a culture at every level, raising awareness of regulatory compliance and internal procedures to manage activities effectively and produce accurate, complete accounting data, with clear task and responsibility assignments and consistent operational delegations.

2.7 External communications

Company communications must respect the right to correct information; false or misleading news or comments are not permitted. Communications must comply with laws, professional rules and practices, and be clear, transparent and timely. Relations with the media are reserved to authorized Company functions.

2.8 Transparency and completeness of information

Collaborators must provide complete, transparent, comprehensible and accurate information, enabling stakeholders to make autonomous, informed decisions. Contracts and any agreements must clearly set out the conduct expected during the relationship.

2.9 Confidentiality and handling of information

Eredi Baitelli S.p.A. ensures confidentiality of information in its possession and refrains from seeking confidential data without express, informed authorization and legal basis. Company personnel must not use Company confidential information for non-business purposes, nor process it beyond authorization or Company procedures. All stakeholder information is handled in full compliance with applicable personal-data protection laws.

2.10 Fair competition

Eredi Baitelli S.p.A. complies with competition laws and protects fair competition, refraining from collusive or predatory behavior. Recipients must avoid practices that violate competition rules (e.g., cartels, market sharing, production/sales limits, conditional agreements) and avoid initiatives or contacts between competitors (e.g., discussions on prices/quantities, market division, production/sales limits, customer allocation, price information exchanges) that could appear to breach competition law.

2.11 Prevention of conflicts of interest

Employees, corporate officers and anyone acting for the Company must avoid situations in which those involved in operations or transactions are, or may even appear to be, in conflict of interest. Potential conflicts must be promptly reported to one's Function Manager and the Director for assessment.

2.12 Gifts, gratuities and benefits

Eredi Baitelli S.p.A. condemns all practices of corruption, improper favours, collusive behavior and solicitation of personal advantages. No form of offering, giving or promising money, goods or benefits (e.g., cash, items, services, favours) to/from third parties—including Italian or foreign public officials and their relatives—may be made where it could be construed as exceeding normal business courtesy or aimed at obtaining preferential treatment. Only modest-value courtesies that promote the Company's image or initiatives, authorized by management and properly documented, are permitted.

2.13 Protection of industrial and intellectual property

Eredi Baitelli S.p.A. respects third-party intellectual and industrial property rights and related laws and conventions. Rights over knowledge developed in the workplace belong to the Company. Employees must help safeguard Company IP and refrain from using it for personal purposes or enabling others to do so; they must prevent conduct harmful to Company IP or trade secrets and refrain from altering/counterfeiting patents, designs and/or industrial models or using altered/counterfeit ones.

2.14 Counterfeit parts

The Company undertakes not to use counterfeit parts, components, software or other products, and acts if any party markets counterfeit products, parts or spares made by Eredi Baitelli S.p.A. (see EU Regulation No. 608/2013).

2.15 Export and marketing of goods

The Company complies with applicable restrictions on exporting goods, software, services and technologies and with trade restrictions involving certain countries, regions, companies, entities and individuals.

2.16 Responsibility towards the community

The Company is aware that its activities affect economic and social conditions and the general well-being of the community, and of the importance of social acceptance in the communities where it operates. It conducts its business with respect for local, national and international communities.

3. RULES OF CONDUCT IN RELATIONS WITH PERSONNEL

3.1 Staff recruitment

Candidate evaluation is based on fit to Company needs and requirements, ensuring equal opportunities. Information requested must strictly relate to assessing professional and psycho-aptitude profiles, verifying compliance with national and international legal requirements, and suitability for preventing offences, in line with non-discrimination and data-protection principles.

3.2 Establishing the employment relationship

Personnel are hired under regular employment contracts; undeclared or irregular work is not tolerated. Upon hiring, each employee receives clear information about:

- 3.2.1** function, responsibilities and duties;
- 3.2.2** legal and remuneration elements per the national collective agreement;
- 3.2.3** rules and procedures to avoid unlawful conduct and to follow Company policies.

Information is provided so that acceptance is based on actual understanding.

3.3 People management

Managers must value employees' working time by requesting tasks consistent with their roles and work plans. Abusing authority by demanding favors or any behavior that violates this Code is prohibited. Where envisaged, employees are involved in discussions and decisions to improve processes and must participate with cooperation and independent judgment. Management must operate in compliance with systems and tools provided by the Company.

3.4 Development and training of resources

Managers must fully utilize and develop the professional skills in their teams. The Company provides information and training tools to enhance competencies and professional value, including institutional training (e.g., onboarding, safety, management systems and risk prevention, Company/business induction) and operational training.

3.5 Workers' rights: health and safety at work

The Company provides and maintains safe, healthy workplaces in compliance with safety laws and fosters a culture of safety by raising risk awareness and promoting responsible behavior among all collaborators, suppliers and contractors operating on Company premises or at customers' sites. Measures include:

- 3.5.1** risk management analyses, security, and resources to be protected;
- 3.5.2** control and updates to risk-control systems.
- 3.5.3** training and communication initiatives.

3.6 Workers' rights: privacy protection

The Company protects the moral integrity of collaborators and guarantees dignified working conditions. Physical or psychological violence, sexual harassment, and any discriminatory or offensive behavior are not tolerated. Employees who believe they have been harassed or discriminated against may report to the Supervisory Committee, which will assess any violation.

3.7 Workers' rights: protection of the person

The Company protects the moral integrity of collaborators and guarantees dignified working conditions. Physical or psychological violence, sexual harassment, and any discriminatory or offensive behavior are not tolerated. Employees who believe they have been harassed or discriminated against may report to the Supervisory Committee, which will assess any violation.

3.8 Workers' duties: general conduct

Employees must act loyally, complying with contractual obligations, this Code, and Company procedures/instructions, ensuring high standards of performance. They must avoid behaviors that could damage Company assets, management, stakeholder relations, or the Company's image. Decisions must follow sound, prudent management principles, carefully assessing potential risks. Operations and transactions must reflect fairness, completeness and transparency of information, formal and substantive legality, and clear, truthful accounting records, and must be verifiable. Soliciting or accepting recommendations, favors, gifts or other benefits that could influence independence or impartiality is prohibited.

3.9 Workers' duties: conflicts of interest

All collaborators must avoid situations that may generate conflicts of interest (e.g., interests with suppliers or customers) and refrain from personally exploiting business opportunities learned in their roles. Apparent conflicts must be reported to the direct manager, who informs management for assessment.

3.10 Workers' duties: protection of Company assets

Each employee must diligently protect assigned Company assets and prevent fraudulent or improper use, acting responsibly and in line with objectives and operating rules. Use of Company tools by employees and/or consultants (for the latter, within contractual limits) must be functional and exclusively for work activities or authorized purposes. The Company reserves the right to prevent improper or unlawful use through appropriate control systems.

3.12 Workers' duties: information management

Employees must know and apply Company information-security policies to ensure integrity, confidentiality and availability. Information acquired in the course of activities must remain strictly confidential and appropriately protected, and may not be used, communicated or disclosed internally or externally except in compliance with the law and Company procedures. Documents must be drafted clearly, objectively and comprehensively, allowing verification by colleagues, managers or authorized external parties.

4. RULES OF CONDUCT IN RELATIONS WITH CUSTOMERS AND SUPPLIERS

In addition to complying with the Management System Manual and related procedures and work instructions, the following apply.

4.1 Starting and maintaining business relations

When initiating or managing relations with customers and/or suppliers, it is prohibited—based on public/legitimate information—to establish or maintain relations:

- 4.1.1** with parties involved in unlawful activities or lacking seriousness and commercial reliability;
- 4.1.2** with parties who, directly or indirectly, hinder human development or violate fundamental rights (e.g., exploiting child labour, facilitating migrant trafficking or sex tourism);
- 4.1.3** with parties who do not formally commit—e.g., in contracts—to comply with labour law (particularly regarding child labour) and workers' health and safety, and, in general, with all principles of this Code.

It is also forbidden:

- 4.1.4** to provide unjustified benefits to partners;
- 4.1.5** to pay fees to external collaborators not justified by the engagement or normal market values;
- 4.1.6** during negotiation and sales, to give gifts or donations of any kind to persons with decision-making roles within customers or to related external parties, beyond the following limits: EUR 150.00 annual cap for public entities or related parties, and EUR 150.00 for private parties.

Any doubts during commercial activities concerning the above points must be promptly reported to the Supervisory Committee.

4.2 Relations with customers

Professionalism, competence, availability, respect and fairness guide relations with customers.

To protect the Company's image and reputation, customer relations—including advertising—must ensure full transparency and fairness, legal compliance, and independence from internal or external pressures.

4.3 Contracts and communications to customers

Contracts and communications must be :

- 4.3.1** clear and simple, use language close to that of interlocutors;
- 4.3.2** comply with applicable rules without evasive or improper practices;
- 4.3.3** follow Company commercial policies and parameters;
- 4.3.4** and be complete, without omitting elements relevant to customer decisions.

Appropriate channels must be chosen to avoid deceptive or untruthful advertising tools.

4.4 Relations with suppliers

Purchasing must be conducted with loyalty, integrity, confidentiality, diligence, professionalism and objectivity by qualified personnel responsible for their evaluations, ensuring compliance with all relevant regulations. Those responsible for purchasing must:

- 4.4.1** act with impartiality and independence based on objective, documentable criteria;
- 4.4.2** avoid personal obligations to suppliers and disclose personal relationships before negotiations;
- 4.4.3** build solid, mutually beneficial and appropriately lasting relationships;
- 4.4.4** immediately report to the Supervisory Committee any attempt to distort normal business relations;
- 4.4.5** not offer goods/services (especially gifts) to obtain confidential information or benefits;
- 4.4.6** not accept goods/services in exchange for confidential information or favoritism, even where there are no direct repercussions for the Company.

4.5 Transparency of the purchasing process

Procedures must ensure separation of roles between:

- 4.5.1** the requesting unit and the contracting unit;
- 4.5.2** adequate traceability of decisions;
- 4.5.3** retention of information and documents relevant to managing the relationship.

Contracts of significant value must be constantly monitored and signed by duly empowered/delegated parties.

4.6 Contract clauses on ethical conduct in supplies

Violations of Code principles entail sanctions. Specific clauses must therefore be included in contracts to ensure compliance with the Code in supplies.

5. RULES OF CONDUCT IN RELATIONS WITH PUBLIC ADMINISTRATION

In addition to compliance by recipients with the Eredi Baitelli S.p.A. management system manual, as well as the procedures and operating instructions referred to therein, the following criteria of conduct are set forth, applicable to all recipients of this Code of Ethics, regarding relations with public administration.

5.1 Reference scope

"Public Administration" includes any public body, independent administrative agency, any person acting as a public official or in a public-service role, members or officials of EU institutions, or foreign State officials. Private entities fulfilling public functions for overriding political-economic reasons are also considered public bodies.

5.2 Risks of corruption and extortion

It is prohibited - directly, indirectly or through intermediaries - to offer or promise money, gifts or compensation in any form, to exert unlawful pressure, or to promise any object, service or favor to managers, officials or employees of Public Administration, persons charged with a public service, or their relatives/household members, to induce official acts or acts contrary to duty, including favoring or damaging parties in legal proceedings, in order to obtain an advantage for the Company. Anyone receiving explicit or implicit requests for benefits from such subjects must::

- 5.2.1** immediately suspend relations;
- 5.2.2** inform in writing the Supervisory Committee and their manager.

These prohibitions cannot be circumvented via other forms of support (e.g., engagements, consultancies, advertising) with similar purposes.

5.3 Fairness in business with Public Administration

Even though supplying directly to Public Administration is not part of normal Company strategy, whenever such relations arise (including public tenders), actions must always comply with law and proper business practice. It is forbidden to:

- 5.3.1** consider or propose job or business opportunities that may personally benefit public employees or their superiors;
- 5.3.2** offer or provide gifts other than of modest value, ensuring traceability through documentation;
- 5.3.3** seek or obtain confidential information that could compromise the integrity or reputation of either party.

5.4 Statements and declarations to Public Administration

It is forbidden to use or submit false statements/documents or omit information to obtain, for the Company's benefit or interest, contributions, funding or other disbursements granted by the State, public bodies or the EU; and to mislead others by trickery to procure an unjust profit for the Company, particularly if the State or a public body is misled. "Unjust profit" includes, besides contributions/funding/disbursements, concessions, authorizations, licenses or other administrative acts.

5.5 Use of contributions and funding received

Contributions, funding or any disbursements granted to the Company by the State, public bodies or the EU must not be used for purposes other than those for which they were granted.

5.6 Data and IT systems relating to Public Administration

It is forbidden to alter the operation of any IT/telecommunications system or to unlawfully interfere with data, information or programs contained therein or related thereto, to obtain unjust profit causing harm to others—especially if the State or a public body is harmed.

6. RULES OF CONDUCT IN RELATIONS WITH THE COMMUNITY AND INSTITUTIONS

In addition to the recipients' compliance with the Eredi Baitelli S.p.A. management system manual, as well as the procedures and operating instructions referred to therein, the following criteria of conduct are set forth, applicable to all recipients of this Code of Ethics, regarding relations with the community and with institutions.

6.1 Social policy

Eredi Baitelli S.p.A. pursues objectives consistent with the development of the community and environment in which it operates, recognizing that community satisfaction is both a Company aim and a competitive advantage.

6.2 Relations with political parties, trade unions and associations

Eredi Baitelli S.p.A. does not finance political parties – either in Italy or abroad – their representatives or candidates, nor does it sponsor congresses or events with purely political propaganda ends. It refrains from any direct or indirect pressure on political figures (e.g., accepting referrals for hiring, consultancy contracts).

6.3 Institutional relations

All relations with public institutions linked to ordinary administrative activities must observe transparency and fairness, avoiding collusive attitudes. To ensure clarity, contacts with institutional counterparts must occur exclusively through representatives expressly mandated by the Company's legal representatives.

7. RULES OF CONDUCT FOR ACCOUNTING, ADMINISTRATIVE OR FINANCIAL ACTIVITIES

All individuals (employees and/or consultants) involved – at any level, including as mere data providers – in drafting financial statements or similar documents, or any documents representing the Company's economic, equity or financial situation (including directors, statutory auditors and senior managers), must:

- 7.1** provide maximum cooperation and ensure completeness, clarity and accuracy of information and data;
- 7.2** refrain from presenting untrue facts – even if subject to evaluation – or omitting information or concealing data in violation of laws or internal rules, thereby misleading recipients.

- It is prohibited to obstruct legally entrusted control or audit activities;
- to manipulate shareholders' meetings by simulated or fraudulent acts;
- to spread false information or conduct simulated operations or other artifices likely to significantly alter the price of financial instruments;
- to hinder supervisory authorities, or to communicate untrue facts or fraudulently conceal facts that should be reported regarding the Company's situation.

8. RULES OF CONDUCT ON ANTI-MONEY LAUNDERING

Recipients must not, under any circumstances, be involved in money-laundering of proceeds from criminal activities or in receiving goods or other benefits of illicit origin. They must verify, in advance, information on counterparties (commercial partners, suppliers, collaborators, consultants) to ascertain their reliability before establishing business relations. The Company complies with all national and international anti-money-laundering laws and the related procedures and work instructions for prevention.

9. ENVIRONMENTAL PROTECTION

Eredi Baitelli S.p.A. promotes production policies that balance economic development and value creation with environmental respect and protection. The Company complies with applicable environmental laws where it operates and contributes to sustainable local development through best available technologies, continuous monitoring of processes, and solutions with lower environmental impact in materials, resources, packaging, distribution and product lifecycle.

The Company is committed to protecting people's health, natural resources and the environment, actively promoting sustainable and responsible industrial development beyond legal compliance by integrating environmental best practices into all decisions. All production stages must, to the extent technologically possible, reduce environmental impact, with particular attention to energy and water savings, greenhouse-gas emission reduction and waste-recycling strategies. Products in the supply chain must meet the highest environmental standards for their market segment, in materials, substances and manufacturing processes. In designing products and processes, the Company actively seeks advanced technological solutions to reduce waste and pollutants, conserve resources and increase recycling, to foster sustainable development and minimize environmental impact.

10. APPLICATION MECHANISMS OF THE CODE OF ETHICS

10.1 Dissemination and communication

The Company commits to disseminating the Code via all available channels (e.g., corporate website, information meetings, staff training). All personnel must have the Code, know its contents and comply with it. HR, also based on input from the Supervisory Committee, prepares and implements a training plan to foster knowledge of principles and ethical rules, differentiated by role and responsibility; specific training is provided for new hires. The Supervisory Committee and management are available for clarifications. Management must include Code content in training programs and reference it in procedures, policies and guidelines.

10.2 Supervision over implementation of the Code of Ethics

Implementation is monitored through audits planned according to risks and prior results, with the aims of:

- 10.2.1** verifying application and compliance; monitoring initiatives to disseminate knowledge and understanding of the Code;
- 10.2.2** ensuring ethical communication and training; analyzing and integrating proposals to revise policies/procedures with significant ethical impacts;
- 10.2.3** receiving and analyzing reports of violations;
- 10.2.4** suggesting any need to revise the Code of Ethics.

10.3 Reporting problems or suspected violations

Anyone who becomes aware of, or reasonably believes in, a violation of this Code, a law or Company procedures must immediately inform their manager and the Supervisory Committee. Reports must be in writing and may be anonymous. The Company protects whistleblowers from retaliation or discrimination (e.g., termination of relations with partners/suppliers/consultants; denial of promotions), ensuring confidentiality of the reporter's identity, subject to legal obligations.

- Contact the Supervisory Committee by e-mail **comitato.vigilanza@eredibaitelli.it**
- Reports sent directly to this address ensure confidentiality as they are managed by the Supervisory Committee. Founded reports are forwarded to competent parties. Any retaliatory or discriminatory measures may be reported to the Italian National Labour Inspectorate. Dismissal, change of duties or any retaliatory/discriminatory measure against the reporter is void. The Supervisory Committee is responsible for investigations into potential violations (see 2.6).

10.4 Disciplinary measures for violations

This Code forms an integral part of contractual obligations undertaken by personnel and by parties doing business with the Company. Violations of the principles and conduct set out herein undermine the relationship of trust between Eredi Baitelli S.p.A. and the violators - whether directors, employees, consultants, collaborators, customers or suppliers.

11. FINAL PROVISIONS

The Code of Ethics was approved in first issue by the Board of Directors on **03.18.2025**.

Any amendments and/or additions will be approved by the Board, after consulting the Supervisory Committee, and promptly communicated to recipients. Formal revisions may be approved by the Legal Representative.