

CODE OF CONDUCT FOR GESSI SUPPLIERS

I – PURPOSE AND SCOPE

In the companies belonging to the Gessi Group ("Gessi"), we are committed to upholding the highest standards of integrity, transparency and accountability in all our business activities. This would not be possible without the cooperation of all parties in our supply chain, including all our suppliers.

That is why we have approved this Code of Conduct which outlines our expectations regarding the treatment of workers, environmental protection and ethical business practices. The requirements and expectations defined in this Code of Conduct apply to all Gessi suppliers, regardless of the supplier's location or place of business. As a Gessi supplier, we expect you to share this commitment and abide by this Code of Conduct.

Gessi requires all its suppliers to adhere to this Code of Conduct and to strictly comply with it. In particular, we expect all our suppliers to:

- respect the human rights of all individuals, including the right to fair treatment, freedom from discrimination and harassment, and safe and healthy working conditions;
- protect the environment and minimise the impact of their business activities on natural resources and ecosystems;
- act with integrity and honesty in all business dealings, including the prohibition of corruption and bribery;
- comply with all applicable laws, regulations and industry standards;
- implement mechanisms to identify and manage risks related to the above-mentioned issues;
- make available, upon Gessi's reasonable request, adequate documentation demonstrating the implementation of the principles outlined in this Code of Conduct.

We take the issues outlined herein very seriously and will not tolerate any violations of this Code of Conduct. In the event of such violations, we may take appropriate actions, including the termination of the business relationship. Furthermore, we expect our suppliers to cooperate fully with any investigation into potential violations and to take the necessary corrective actions. We believe that by working together, it is possible to create a

responsible and sustainable supply chain that benefits all stakeholders.

II- HUMAN RIGHTS AND WORKING CONDITIONS

We expect all our suppliers to comply with all laws, regulations and industry standards, including Collective Bargaining Agreements, where applicable, regarding human rights and working conditions.

Modern slavery and forced labour

Our suppliers must not engage in any form of forced or coerced labour, including, but not limited to, bonded labour, slavery, human trafficking, servitude, labour exploitation or violence.

All workers shall be free to leave their employment and must not be subject to any form of physical or psychological coercion or intimidation, such as humiliation, mental abuse, threats or sexual harassment. Suppliers' employees shall begin their employment relationship on a voluntary basis and shall have the right to terminate it in accordance with applicable laws.

Child labour

Child labour is a serious and persistent problem in many parts of the world. Our company is committed to eliminating the employment of children under the minimum legal age set by the Country in which the work is performed and in any case under the age of 18 in work that is hazardous, abusive and/or interferes with their education and development, including for example work during nighttime hours. We expect our suppliers to adhere to the highest ethical standards and comply with all applicable laws and regulations regarding the employment of minors.

We are committed to promoting the rights of children and ensuring that they are protected from exploitation. We will work with our suppliers and other stakeholders to raise awareness on the issue of child labour and to promote practices that support the rights and welfare of children.

Discrimination and the promotion of diversity

Our suppliers must treat all workers with dignity

and respect and shall not discriminate or harass them on the basis of race, ethnicity, religion, gender, sexual orientation, age, disability or any other characteristic protected by law. Suppliers must promote diversity and inclusion in the workplace and encourage the development of a workforce that reflects the diversity of the communities in which they operate.

Respect for freedom of association and collective bargaining

Our suppliers must respect the right of workers to associate freely and bargain collectively and must not interfere with the formation of workers' organisations or the negotiation of Collective Bargaining Agreements.

Health and safety

Gessi places particular importance on the health and safety of all employees, including those working in our supply chain. We expect our suppliers to provide a healthy and safe working environment for all employees and to comply with all applicable health and safety laws and regulations.

This includes the provision of appropriate protective equipment, training and supervision to ensure that employees are able to work safely and without risks to their health. In addition, it is necessary to ensure that all equipment and machinery used are properly maintained and that all facilities, including toilets and common areas, are clean and safe. We also expect our suppliers to have a system in place to identify and address potential health and safety hazards and to take timely action to correct identified hazards.

We recommend having a certified safety management system such as ISO 45001.

Working hours and holidays

We require our suppliers to ensure that their employees are treated with respect and dignity and that they have fair and reasonable working hours. We expect our suppliers to comply with all applicable laws and regulations regarding working hours and holidays, including laws regulating the maximum number of working hours per week and the entitlement to rest periods and holidays.

We also expect our suppliers to adopt policies to ensure that employees are able to take holidays

and personal days as needed. This may include the granting of paid leave or other forms of compensation.

Employment contracts and wages

All employees, including temporary workers, apprentices and trainees of our suppliers must be provided with regular employment contracts in writing outlining all terms and conditions of the employment, including wages and benefits. These contracts must be communicated to all employees, and pay slips must be delivered to employees in every pay period in an appropriate format and language they can easily understand.

Suppliers must ensure that wages and related benefits, including overtime pay, meet or exceed the minimum standards set by national, international, regional and/or local laws and regulations. Such remuneration must be at least equal to the minimum wage for equivalent work in the Country and sufficient to provide employees and their families with a decent standard of living. Remuneration must be based on the employee's skills, experience, professional potential and performance and must maintain wage equity for all employees on equal conditions and merit. Overtime hours must be adequately compensated in accordance with applicable laws and regulations.

III- ENVIRONMENT AND SUSTAINABILITY

Gessi aims to reduce its environmental footprint and achieve this through innovative working methods, the implementation of responsible behaviour and the continuous improvement of its management systems.

Our sustainability report is available here:

https://www.gessi.com/static/resources/exhibition/bilancio_sostenibilita_en.pdf

We expect all our suppliers to share this commitment and comply with the following environmental standards.

Compliance with environmental regulations

Gessi requires its suppliers to comply with national and international environmental laws, regulations and standards, including those relating to air and water quality, waste management and the handling and disposal of hazardous materials. We recommend having a certified environmental

management system such as ISO 14001 or EMAS.

Reduction of environmental pollution

In addition to meeting legal requirements, our suppliers must prevent, reduce and mitigate any form of environmental pollution, including air, water, soil and groundwater pollution, and promptly restore and remedy any environmental incidents. Suppliers must also minimise the environmental impact of their activities through the use of energy-efficient technologies, the reduction of greenhouse gas emissions and the conservation of natural resources.

In order to promote transparency within its supply chain and minimise the use of rare resources, the supplier is encouraged to trace the sources of conflict minerals and implement measures to this end. Where possible, the supplier should try to limit or avoid the use of rare resources.

Environmental impact monitoring

Suppliers must identify and manage the significant environmental impacts of their business and implement improvement plans, including specific key performance indicators to monitor progress.

Suppliers must also monitor and document their environmental performance and provide Gessi with the relevant quantitative data.

Animal protection and welfare

Where animals are used in the provision of the supplier's services to Gessi, all such animals shall be treated with care, respect and compassion and shall not be subjected to mistreatment or neglect. In particular, all animals must be provided with adequate shelter, food and medical care, including any necessary veterinary treatment. In addition, all animals must be handled and transported in a manner that minimises stress and discomfort.

We strongly discourage the use of animals in any experimental activity.

IV - COMPLIANCE AND ETHICS

We prioritise integrity, transparency and accountability in all aspects of our business and expect our suppliers to uphold these values as well. We and our suppliers adhere to high ethical standards in all our business practices.

Corruption and bribery

We will not tolerate, and expect our suppliers not to tolerate, any form of corruption or bribery, whether active or passive, in any context, form and manner and in any jurisdiction. This includes not only illegal activities, but also practices that may be accepted, tolerated or not judicially prosecuted in certain contexts, but which could undermine our commitment to integrity.

More specifically, we expect our suppliers to reject and prevent any form of bribery and to refrain from giving, offering or accepting bribes, kickbacks, facilitation payments, business opportunities, gifts or entertainment, improper donations or payments, or any other inappropriate favours or benefits to or from business partners, public officials or other third parties (whether private or public). In particular, such conduct is considered inappropriate or improper when it creates or is expected to create a sense of obligation that may influence business decisions.

Suppliers must also not solicit advantages and must avoid conflicts of interest that could lead to the risk of corruption.

Our suppliers must ensure that their directors, officers, employees, suppliers, affiliates, subcontractors and representatives (collectively referred to as 'Third Parties') also comply with the rules outlined in this section and implement and maintain an effective compliance framework.

Other unlawful acts

We will not tolerate any form of fraud or illegal activity by our suppliers or their employees. This includes fraudulent financial reporting, embezzlement, extortion, insolvency offences, illegal payments, money laundering and any other illegal acts.

Unfair competition and antitrust

Our suppliers must compete fairly and in compliance with all applicable antitrust and unfair competition laws and regulations. Unlawful conduct includes, but is not limited to, price fixing practices, territorial marketing restrictions, and employee poaching.

Quality and continuous improvement

Suppliers are encouraged to continuously improve

their performance in terms of quality, cost and time. In fact, we expect our suppliers to strive for continuous improvement in the quality of the services provided, to reduce the time needed to perform these services, and to constantly seek the best value for money.

We recommend having a certified safety management system such as ISO 9001.

Compliance with trade regulations

Ensuring responsible trade is important to Gessi and, therefore, requires its suppliers to comply with all applicable trade laws and regulations, including those relating to import and export controls, trade sanctions and customs procedures. Suppliers must keep abreast of these regulations. Without limiting the scope of the above obligations of suppliers, Gessi may from time to time issue instructions to suppliers regarding compliance with Italian, EU and other applicable regulations. Such instructions shall be immediately applied and strictly adhered to by the suppliers.

We also expect suppliers to document imports and exports accurately and have procedures in place to mitigate the risks related to trade and export controls.

We recommend our suppliers not to cooperate with parties that seek to directly or indirectly send goods or data to parties or countries where the same is prohibited under European Union and other applicable regulations.

Management of compliance systems

Our suppliers must have adequate governance and compliance systems in place to ensure compliance with all applicable laws and regulations, as well as with this Code of Conduct.

To enable full transparency, suppliers must maintain accurate and complete records in compliance with all applicable laws and regulations, including those related to financial reporting, taxation and anti-corruption.

Our suppliers are required to provide high quality, safe and effective services in full compliance with Gessi's instructions, industry standards and applicable national and international regulatory requirements. Suppliers shall also perform their activities in accordance with the legal provisions of

the various Countries in which the products are to be marketed, where applicable.

Data protection

We expect our suppliers to comply with all applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) and all relevant national laws, and to adhere to the following standards:

- have adequate policies and procedures in place to protect the privacy and security of personal data, including measures to prevent unauthorised access, use or disclosure of such data;
- collect, use or disclose personal data only for legitimate and lawful purposes and in compliance with the rights of the data subject;
- implement appropriate technical and organisational measures to protect personal data against unauthorised access, use or disclosure; and
- inform Gessi of any breach of the above obligations, if it relates to personal data transmitted to the supplier by Gessi and of any security-relevant event that could lead to such a breach.

Confidentiality

All information that you will obtain from Gessi or become aware of in the course of doing business with Gessi (or in any other context related to our company) shall be treated with the utmost confidentiality and in accordance with applicable laws, regulations and contractual terms, including any non-disclosure agreements in force between the parties. Unless specifically authorised in writing by Gessi, our suppliers must not disclose this information to third parties and must implement appropriate measures to properly manage the collection, storage, use and sharing of this information. This includes preventing the misuse, falsification, forgery, theft or unauthorised disclosure of Gessi's information. We rely on our suppliers to respect the confidentiality of this information of Gessi and our business partners and to treat it with care.

Intellectual Property

At Gessi we value innovation and creativity and are committed to protecting our intellectual property rights. We expect our suppliers to respect and

protect our intellectual property and the intellectual property rights of others.

This includes respecting our trademarks, industrial designs, copyrights, patents and any other intellectual property rights of Gessi and the technology we share with our suppliers. We expect our suppliers to use such information only for the purpose of fulfilling their obligations to us and that they take reasonable steps to protect it from unauthorised use or disclosure.

In order to ensure the highest level of protection of our most valuable assets, suppliers shall not use any of Gessi's intellectual property rights unless authorised by Gessi s.p.a. in writing and in accordance with its instructions. In any case, suppliers shall undertake to use Gessi's intellectual property rights (when duly authorised) in a manner that promotes Gessi's goodwill.

Furthermore, suppliers must ensure that the products delivered to Gessi are original and do not infringe the intellectual or industrial property rights of third parties.

V - REPORTS AND AUDITS

We believe that compliance with this Code of Conduct is beneficial to all stakeholders and contributes to building a sustainable and fair supply chain. The values set out in this Code of Conduct are of particular importance to Gessi and, therefore, we ask all suppliers to strictly comply with the rules set out herein and to adhere to the following monitoring rules.

Reports

I Our suppliers must promptly report to us any suspected or confirmed violations of this Code of Conduct and/or relevant laws. This includes violations committed by employees, consultants, partners, agents or other representatives acting on behalf of the supplier or Gessi.

To report any alleged or confirmed violations, please use the following addresses: e-mail: gessi@gessi.it
mailing address: Hamlet Vintebbio, Parco Gessi, 13037 Serravalle Sesia, (Vercelli) Italy.

We assure you that all reports received will be treated confidentially, discreetly and without any form of retaliation. However, this general principle

does not exempt or limit reporting obligations that may arise as a result of reports, including to the Judicial Authority or other competent authorities. We encourage all recipients to report possible violations in order to maintain a culture of integrity and compliance within our organisation.

Audits

In order to promote transparency and ensure compliance with the standards outlined in this Code of Conduct, we may conduct unannounced inspections at any time during normal working hours. Such inspections may be carried out by our staff or by third parties specifically authorised or delegated by us. During such inspections, we may request access to the offices and premises where our suppliers operate, as well as to documentation and evidence, such as photographs. We may also conduct interviews with company directors, employees and other personnel at the supplier's workplaces.

We ask all our suppliers to cooperate with these inspections and to keep all documentation necessary to verify compliance with this Code of Conduct and relevant laws and regulations. A supplier's failure to comply with this Code of Conduct, refusal to establish a recovery plan or failure to implement an agreed recovery plan may result in a breach of contractual obligations and the suspension or termination of Gessi's business relationship with that supplier.

For any questions about the interpretation or application of our Code of Conduct, please do not hesitate to contact Gessi's contact persons directly involved in the management of your business relationship with us.