

CODE OF ETHICS

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CONTENTS

0. Introduction	3
1. Who does the Code of Ethics apply to?	3
1.1 Who does the Code of Ethics apply to?	3
1.2 Distribution and observance of the Code of Ethics	3
2. Our ethical principles	4
2.1 Valuing people and equality	4
2.2 Listening, respect and open dialogue	4
2.3 Community and shared responsibility	4
2.4 Integrity and transparency	4
2.5 Correctness and absence of conflicts of interest	4
2.6 Confidentiality and privacy	5
2.7 Anti-corruption	5
2.8 Fair competition	5
2.9 Money laundering	5
2.10 Financial integrity and accounting transparency	5
2.11 Research, innovation and intellectual and industrial property	6
2.12 Upholding human rights	6
2.13 Protecting the environment	6
2.14 Occupational health and safety	6
2.15 Compliance with laws and regulations in the countries we operate in	6
The ten ethical principles of the UN Global Compact	8
3. Rules of conduct for relations with employees and internal personnel	9
3.1 Protecting people	9
3.2 Relations between colleagues	9
3.3 Management and development of human resources and equal opportunities	9
3.4 Abuse and violence in the workplace	10
3.5 Protecting company assets	11
3.6 Protecting trade secrets	11
3.7 Protecting the company image and reputation	11
3.8 Alcohol, smoking and drugs	11
4. Rules of conduct for relations with suppliers	12
4.1 Impartiality and independence in the selection and qualification of suppliers	12
4.2 Correct relations with suppliers	12
4.3 Confidentiality	12
4.4 Anti-counterfeiting provisions	12
5. Rules of conduct for relations with customers, end consumers and professionals	12
5.1 Customer satisfaction and observance of commitments	12
5.2 Fairness and impartiality	12
5.3 Transparency and full disclosure	13
5.4 Data protection and customer confidentiality	13
5.5 Anti-counterfeiting provisions	13
6. Rules of conduct for relations with public administration	13
7. Rules of conduct for relations with the media	14
8. Rules of conduct for relations with the public and local community	14
8.1 Rules of conduct for relations with the local community	14
8.2 Rules of conduct for relations with political and trade-union organisations	14
9. Methods for application of the code of ethics	15
9.1 Whistleblowing	15
9.2 Penalties	15
10. Relevant questions for application of the Code of Ethics	16

0. INTRODUCTION

Claber specialises in the production of DIY domestic irrigation products.

Its headquarters are located in Fiume Veneto, in the province of Pordenone, north-east Italy.

Founded in 1969, it has shaped the development of modern irrigation with new automated solutions offering effective irrigation of domestic green spaces.

The company's mission is to offer **reliable, accessible and environmentally friendly** DIY domestic irrigation solutions.

The Company recognises the value of water and sets itself the goal of creating irrigation systems that enable optimal and efficient use of this resource, which is increasingly critical for humanity, thus protecting the environment.

Our mission is achieved by adopting the principles set out in this document.

Claber undertakes to distribute this Code of Ethics as widely as possible, particularly during onboarding of new hires and through specific communication and training activity aimed to facilitate understanding of its contents and application in daily working life for all relevant parties.

The contents of this Code of Ethics may be cited in directives, procedures and internal operating procedures. Any internal documents containing more detailed provisions regarding individual aspects should be considered as supplementary to this document.

The Code of Ethics was first adopted with resolution of Claber's Board of Directors on 20/06/2005 and subsequently updated on 19/01/2018 and 17/11/2023.

GB

1. WHO DOES THE CODE OF ETHICS APPLY TO?

1. Who does the Code of Ethics apply to?

This Code of Ethics applies to directors, auditors, managers and employees of Claber, whatever their position or role, as well as anybody with direct or indirect ongoing or temporary relationships or relations with Claber, each within the scope of their duties and responsibilities.

The aforementioned parties must observe the laws and regulations applicable in the various geographic areas in which Claber operates and adopt conduct aligned with this Code of Ethics.

These parties are also required to understand and observe company procedures applicable to them on the basis of their role and level of responsibility.

This Code of Ethics is valid in Italy and abroad, applied as is appropriate in the context of the various regulatory contexts and cultural, political, social, economic and commercial settings of the different countries in which Claber operates.

1.2 Distribution and observance of the Code of Ethics

Claber promotes and facilitates distribution and observance of the Code of Ethics, enabling awareness of its contents among directors, auditors, managers and employees of Claber, whatever their position or role, as well as anybody with direct or indirect ongoing or temporary relationships or relations with Claber, each within the scope of their duties and responsibilities.

The principles described must form the basis of the internal and external conduct and relationships of all the aforementioned parties.

Every member of personnel must carefully observe all ethical principles set out, promote their dissemination and ensure their application, monitoring – in line with their role – the entire chain of production.

2. OUR ETHICAL PRINCIPLES

With our ethical principles, we intend to:

- Specify the general terms of the “social contract” between our Company and its stakeholders
- Guarantee that, considering the principles as a whole, relations with stakeholders are fairly managed
- Establish a basis for more specific rules of conduct.

2.1 Valuing people and equality

Protecting the individual is the key underlying premise of our organisation, understood both in terms of respect for the individual from a physical and moral perspective, and in terms of the advancement and growth of all internal personnel.

We promote and defend people’s fundamental rights and reject all forms of discrimination on the basis of gender, race, political, religious or sexual orientation, or social and personal circumstances.

2.2 Listening, respect and open dialogue

We wish to cooperate to establish a pleasant working environment. A working environment where interpersonal relations are valued and listening, respect for opinions and harmonious dialogue are a daily commitment for all, in every aspect of our work. We carefully consider the relations we establish with others, considering diversity and the ideas of each individual within our company.

We promote methods of communication rooted in objectivity and independent judgement.

2.3 Community and shared responsibility

We promote the cooperation and the sharing of ideas and practices to build the future together.

We expect equivalent conduct from our partners. The success of the Company is determined by the actions of each individual and every one of us is responsible for it within their own role.

2.4 Integrity and transparency

We promote legality, honesty, fairness and impartiality in all activity within and outside the company, building relationships based on trust with customers, commercial partners, suppliers and all other stakeholders. All of our relations and actions are founded on observance of the principles of transparency, correctness, loyalty, good faith and full disclosure.

2.5 Correctness and absence of conflicts of interest

The principle of correctness requires all parties adopting our Code of Ethics to avoid any situation representing a conflict of interest. In the event of such a situation arising, they must not take any action, but must report the conflict of interest to their superior.

In the context of our organisation, a conflict of interest is a divergence between the interests of the individual and the interests of the company that arises in relation to actions that may lead to an advantage for the person carrying them out or for another figure, directly or indirectly, through a third party close to them, at the same time damaging the interests of the Company.

For illustrative purposes only, the following situations represent conflicts of interest:

- Co-interests, whether evident or concealed, of the employee in activities of suppliers, customers or competitors
- Harnessing of one’s position in the company to pursue interests that go against those of the Company
- Use of information acquired in performance of working activities for one’s own advantage or the advantage of third parties, and in any case going against the interests of the Company
- Use of information acquired in performance of working activities for one’s own advantage or the advantage of third parties, and in any case going against the interests of the Company
- Performance of working activity of any kind (performance of work, intellectual services) for customers, suppliers and/or third parties going against the interests of the Company. It is permitted to participate in administrative bodies or carry out activity for other companies only with authorisation from the Board of Directors of Claber. Before beginning any other activity for profit, such activity must be submitted to Management, which will evaluate the opportunity in terms of possible conflicts of interest.

With specific reference to free offers, the directors and employees of our Company may only accept those falling within the scope of usual courtesy and may not under any circumstances accept those aimed at obtaining favourable treatment in the performance of any business involving Claber. Gifts that do not adhere to this rule must be refused.

2.6 Confidentiality and privacy

We guarantee the confidentiality of information in our possession and we refrain from seeking, distributing or using confidential data, with the exception of those cases expressly authorised by the controller of such information and in any case in accordance with application laws.

Directors, employees and other personnel of our Company must ensure their conduct guarantees maximum confidentiality also outside working hours, in order to protect the know-how and sensitive data of the Company in all business areas (e.g. technical, financial, legal, administrative, commercial and personal-management information, etc.). This applies particularly for those who become aware of confidential and important information in the context of their roles.

2.7 Anti-corruption

We do not tolerate abuse of power for private gain.

We reject any offer, donation, promise of money, goods or other assets from or to third parties that may, even indirectly, be interpreted as exceeding normal gestures of courtesy admitted in the context of standard commercial practice or, in any case, which are aimed at obtaining favourable treatment.

The only forms of commercial courtesy permitted are those falling within boundaries such as not to compromise the integrity and correct ethical and professional conduct of the parties involved.

2.8 Fair competition

We observe regulations on fair competition and avoid conduct that may represent forms of unfair competition.

We condemn all forms of conduct aimed at deceiving and/or altering the rules of free competition. We reject all conduct constituting crimes and we expressly prohibit any form of agreement, with Company employees or third parties, associated in any way with illegal activity.

2.9 Money laundering

Claber must in no way and under no circumstances be implicated in the laundering of money from illegal or criminal activity.

Claber undertakes to observe all money-laundering regulations and provisions.

2.10 Financial integrity and accounting transparency

Accounts must be accurate, complete and up to date, with the aim of providing a faithful representation of the economic, equity and financial situation and management activity.

Every transaction must be supported by adequate, clear and complete documentation, which is stored on file and must be readily available and such as to enable the reasons and characteristics of each transaction to be checked at any time. Specifically, no payment may be made without adequate supporting documentation.

We permit access to information to all parties with a legitimate interest in details of the Company's business for performance of their duties. We guarantee observance of laws and undertake not to in any way directly or indirectly finance or facilitate groups or associations involved in illegal activity.

In the case of economic and equity items based on valuations or estimates, the relevant entries must be reasonable and prudent, clearly illustrating the criteria used to determine the value. For this purpose, the functions involved must contribute honestly to formulation of such valuations.

No false accounting items may be entered into the Company accounts and no employee may bring about such an offence, even on the request of a superior.

All parties acting on behalf of the Company, in the context of their work, are responsible for the definition and correct functioning of the auditing system and are required to notify their superior or the Supervisory Body of any omissions or irregularities they may become aware of.

2.11 Research, innovation and intellectual and industrial property

We promote research and innovation activity on the part of management and other personnel, within the scope of the roles and positions held.

Intellectual assets generated by such innovative activity represent a central and essential asset for Claber. We work to respect all forms of intellectual property held by our Company or by third parties, whether copyright, patents, trademarks, plans, models, industrial and/or trade secrets and all other intangible assets.

2.12 Upholding human rights

In the context of our international business activity and relationships with partners, we undertake to protect and uphold all human rights.

We reject all forms of discrimination, corruption, forced labour and child labour. We place particular importance on recognising and safeguarding the dignity, freedom and equality of all humans, protection of workers and freedom of association, and health, safety and the environment.

In this regard, we operate within the context of the reference framework of the UN Universal Declaration of Human Rights and Fundamental Principles of the International Labour Organisation.

2.13 Protecting the environment

The environment is a primary asset that we undertake to protect. With this goal, we work to reduce the environmental impact of our business and to prevent risks to the environment not only on the basis of applicable regulations but also taking into account developments in scientific research and leading expertise in the field.

We take action to protect the environment in all aspects of our business, adopting processes, technology and materials that enable us to reduce energy consumption and use of natural resources, avoiding or limiting the impacts of Company activity in terms of pollution, greenhouse-gas emissions, waste generation and disruption in local communities.

We run awareness-raising campaigns and training on environmental issues.

2.14 Occupational health and safety

Occupational health and safety for our workers is a primary concern for the Company.

We are committed to disseminating and consolidating health-and-safety culture by developing awareness of risks, promoting responsible conduct from all workers.

Furthermore, we strive to maintain the highest levels of health and safety of our employees, and to guarantee the necessary prevention and protection measures to avoid and minimise risks connected with assigned duties.

All recipients of our Code of Ethics, regardless of their role, are called upon to recognise risks and contribute to maintenance of a healthy and safe workplace, guaranteeing protection of colleagues and other personnel through active participation in the management of health and safety with a view to continuous improvement.

We work to disseminate health-and-safety culture in workplaces with a Zero-Accident target, involving all personnel in activity to raise awareness and provide training and continuous updates for personnel.

2.15 Compliance with laws and regulations in the countries we operate in

Claber intends to do business ensuring, as a binding and essential condition for operations, it acts in accordance with the laws and regulations applicable in all Countries in which it operates.

Claber strongly believes in observing legality and, on this basis, under no circumstances may pursuit of the Company's interests justify conduct that contravenes applicable laws or the rules set out in this document. Since national legislation can differ between countries, we intend to recognise certain fundamental ethical principles that are shared internationally. Specifically, we undertake to observe the ten principles of the UN Global Compact. These are the principles recommended by the United Nations for companies on human-rights and labour issues, environmental protection and anti-corruption. These are universally shared principles derived from the Universal Declaration of Human Rights, from the ILO Declaration, the Rio Declaration and the UN Convention against Corruption, aimed at *"creating an economic, social and*

environmental framework to promote a healthy and sustainable global economy that guarantees everybody the opportunity to share the benefits”.

These principles adopted by Claber shall be required, on a mutual basis, also in any relations the Company has with domestic or foreign public and private parties.

We also reject involvement with parties carrying out illegal activity and those with capital from illegal sources.

The Company expects all employees, other personnel, consultants, suppliers and customers to observe the Code of Ethics, requiring their conduct to be aligned with the principles it contains and demanding its explicit acceptance.

“I call on you – individually through your firms, and collectively through your business associations – to embrace, support and enact a set of core values in the areas of human rights, labour standards, and environmental practices”

(Kofi Annan - General Secretary, UN World Economic Forum, 31 January 1999, Davos)

The ten ethical principles of the *UN Global Compact*

Human rights

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights, and

Principle 2

Make sure that they are not complicit in human rights abuses.

Labour

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4

The elimination of all forms of forced and compulsory labour

Principle 5

The effective abolition of child labour, and

Principle 6

The elimination of discrimination in respect of employment and occupation.

Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges

Principle 8

Undertake initiatives to promote greater environmental responsibility, and

Principle 9

Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

3. RULES OF CONDUCT FOR RELATIONS WITH EMPLOYEES AND INTERNAL PERSONNEL

3.1 Protecting people

We guarantee the physical and moral protection of employees and other personnel, as well as working conditions and environments that respect personal dignity and regulations on workplace health and hygiene. We do not tolerate any form of unlawful work or abuse of certain types of labour such as to bypass applicable laws. We also avoid, directly and indirectly, all forms of forced and child labour, observing and verifying the minimum age of employment and labour.

We guarantee, in accordance with laws, the confidentiality of the information in our possession.

We prohibit the use of confidential data for purposes other than those for which it was provided, in the absence of express authorisation from the data subject and in any case with the most rigorous possible compliance with applicable legislation on privacy and internal Company rules.

The protection of sensitive information and data contained or filed on IT media is guaranteed by the adoption of appropriate safety measures and managed in accordance with applicable laws and regulations.

3.2 Relations between colleagues

All employees and other personnel of Claber are encouraged to ensure relationships with their colleagues are founded on respect, personal dignity and cooperation.

Relationships between managers and personnel must also be founded on respect for roles and cooperation, avoiding all forms of abuse on the part of the manager and insubordination on the part of the member of personnel.

We do not tolerate conduct, behaviour or communication that may be considered hostile, aggressive, provocative, violent, harassing, insulting, defamatory or intimidatory.

All employees and/or other personnel of the Company must:

- set an example for others with their conduct
- remind others to observe the Code of Ethics and facilitate reporting of any inappropriate behaviour
- take measures to ensure that others understand that observing the rules of the Code of Ethics is essential to guarantee quality of work
- actively promote sharing of ideas, with a helpful attitude founded on tolerance and active listening, actively cooperating in the objective circulation of information relevant for optimal performance of the Company's operations, in accordance with principles of privacy and confidentiality
- carefully select, within their remit, employees and/or external personnel, customers, suppliers and all stakeholders in general, in order to avoid assigning duties to figures that are not completely reliable in terms of their commitment to observing the rules of the Code of Ethics
- promptly pass on any reports from employees or internal or external personnel involved with the Company, regarding possible breaches of the Code of Ethics and/or any unlawful activity (see whistleblowing procedure)
- adopt immediate corrective measures where the situation demands it
- prevent any form of reprisal against employees and/or other personnel who have reported breaches of the Code of Ethics.

We promote diversity and integration, with the firm belief that it represents great value for the success of the Company. Cultural exchanges, sharing of lifestyles, skills and expertise, and positive dialogue on different points of view are drivers of innovation and improvement of the organisation.

3.3 Management and development of human resources and equal opportunities

We undertake to offer all employees and other personnel – entirely in accordance with applicable laws and contractual provisions, regardless of the type of contract linking them to Claber – regulatory and remunerative fair treatment based exclusively on criteria of qualifications, ability, experience and merit, with no discrimination whatsoever on the basis of race, colour, gender, religion, political views, nationality or social background.

Those appointed must therefore:

- in any case select, hire, train, remunerate and manage human resources with no discrimination whatsoever in relation to career and profession, regardless of the type of contract linking them to Claber, and guaranteeing fair treatment and equal opportunities
- prepare an appropriate employment contract, in complete accordance with applicable contract law
- use appropriate means to verify the individual's age at the time of hiring, firmly upholding the elimination of all forms of forced or mandatory labour and the effective elimination of child labour (on the basis of ILO conventions) and exercising their influence upon subcontractors, suppliers and all other affiliated companies in order to combat child labour
- in all cases adopt criteria based on merit and competence (and in any case strictly professional) for any decision regarding human resources
- recognise and promote the value of resources, providing instrumental training opportunities so that their employees and/or other personnel, in addition to maintaining their skills, can specialise, consolidate, strengthen and update their professional expertise or access courses for specialisation and further professional qualification.

Claber promotes a working environment in which personal characteristics and orientation cannot be a source of discrimination, and one that promotes a climate within the company that is rooted in respect for the dignity, honour and reputation of each individual, safeguarding the well-being of all of the organisation's people.

In this regard, the Company protects the psychological and physical well-being of employees and other personnel, avoiding improper conditioning or undue distress.

We cooperate through openness and trust with all employees and/or other personnel, with workers representatives and trade unions, through a correct balance of the various interests aimed at achieving the company's goals and upholding the interests of workers. Establishing dialogue with trade-union representatives enables workers and business owners to better understand their respective needs and to identify solutions to any problems that exist.

We guarantee freedom of association to all personnel of the organisation with no interference whatsoever on the part of the employer, giving workers and their representatives the time they need for the associated activities, as per national collective bargaining agreements.

3.4 Abuse and violence in the workplace

Every employee has the right to work in an environment free from any form of discrimination on the basis of race, colour, gender, religion, political views, nationality and social background.

Claber requires that internal and external working relations are founded on the highest levels of correctness and are not a source of unacceptable violence or abuse of any kind, understood as:

- creation of a working environment that intimidates, is hostile towards or isolates individuals or groups of employees
- unjustified interference with performance of others' working activity
- hindering individual work prospects of others merely for reasons of personal competition
- activities or conduct regarding the working life of the recipient being connected with the provision of sexual favours
- proposals of private interpersonal relations, despite expressly communicating or it being reasonably evident that they are unwanted, which may, based on the specific characteristics of the situation, disturb the recipient and have objective impacts on their work
- etc.

Abuse or violence derives from the unacceptable conduct of one or more individuals, with the aim or effect of compromising the person's dignity, harming their health and/or creating a hostile working environment. Abuse is when one or more individuals repeatedly suffer deliberate abuse, threats and/or humiliation, and can:

- be of a physical, psychological and/or sexual nature

- involve isolated incidents or more systematic behaviour
- occur between colleagues, between superiors and their subordinates or involve third parties
- develop from minor cases of a lack of respect to more serious actions, including crimes requiring intervention of the public authorities.

Violence is when one or more individuals are attacked at work.

We view all acts or conduct that may be considered as abuse or violence in the workplace as unacceptable and we undertake to adopt appropriate measures against those involved in such conduct.

We recognise the principle by which the dignity of workers cannot be violated by actions or conduct representing abuse or violence, firmly upholding the idea that abuse and violence in the workplace must be reported.

Workers and the Company itself have a duty to cooperate to maintain a workplace where the dignity of every individual is respected and interpersonal relations are fostered that are founded on principles of equality and mutual correctness, also in implementation of the Agreement of European Social Partners of 26 April 2007 and the joint declaration of 25 January 2016.

3.5 Protecting company assets

We require all personnel to act with diligence in order to protect, handle and store the company assets and resources assigned to them in the context of their work, and to use these properly and in line with the interests of the Company, with all improper use prohibited.

Employees and other personnel undertake not only to protect assets but to prevent their fraudulent or improper use for their own benefit or for the benefit of third parties or even Claber.

3.6 Protecting trade secrets

Claber's activity requires constant acquisition, storage, processing, communication and disclosure of news, documents and other data regarding negotiations, administrative procedures, financial transactions, know-how (contracts, deeds, reports, notes, studies, drawings, photographs, software, etc.) that on the basis of contractual agreements may not be divulged or which may damage the company's interests if divulged in an inappropriate manner or at an inappropriate time.

Without prejudice to the transparency of the activity carried out and disclosure obligations imposed by applicable regulations, Claber employees and other personnel must collaborate to ensure the confidentiality required by the relevant circumstances for each piece of information obtained as a result of their work.

Information, knowledge and data acquired or processed during one's work or through one's duties belongs to Claber and may not be used, communicated or divulged without specific authorisation from the manager in compliance with specific procedures.

3.7 Protecting the company image and reputation

L'immagine e la reputazione di Claber rappresentano un patrimonio che dipendenti e collaboratori devono tutelare con il loro comportamento in ogni situazione, tenendo conto dell'evolversi del contesto sociale, della tecnologia (ad esempio posta elettronica, internet, social media) e dei nuovi strumenti disponibili. Poste la libertà d'opinione d'ogni collaboratore e le scelte effettuate dall'Azienda, i comportamenti di ognuno si devono conformare alla salvaguardia della reputazione di Claber.

3.8 Alcohol, smoking and drugs

All Claber employees personally contribute to promoting and maintaining a climate of mutual respect in the workplace. Particular attention must be focused on personal safety and the safety of colleagues.

Specifically, it is prohibited to:

- possess, consume, sell or provide, in any way, drugs or alcohol or other substances with equivalent effects, during work or in the workplace
- smoke in the workplace, even where it is not prohibited by national legislation.

4. RULES OF CONDUCT FOR RELATIONS WITH SUPPLIERS

4.1 Impartiality and independence in the selection and qualification of suppliers

We guarantee fair competition between suppliers.

Selection takes place through a procurement process that is as objective and fair as possible, and adopting transparent methods and criteria including qualification, function, experience and performance.

Observance of the principles set out in this Code of Ethics is a necessary requirement for establishment or continuation of commercial relationships.

Within our Company, we must observe internal procedures for the selection and management of relationships with suppliers and we must avoid hindering any supplier that has the requirements to compete for a certain supply contract.

4.2 Correct relations with suppliers

Procurement processes are based on precontractual and contractual conduct aimed at indispensable and mutual fair treatment, transparency and cooperation.

The fees paid to suppliers must be calculated exclusively in relation to the services or products supplied.

We establish written agreements with suppliers.

We undertake to:

- during definition of contracts, we invite suppliers to share all information that enables us and the supplier to observe the commitments undertaken, avoiding any possible misunderstandings
- include observance of the principles of Claber's Code of Ethics in contracts with suppliers
- keep ourselves free from any personal obligation towards suppliers. Any personal relationships between employees and suppliers must be reported to the direct supervisor before any negotiations
- immediately report to our direct superior any attempt to alter normal commercial relations.

Gifts, benefits and payments in kind that may represent activity aimed at obtaining favours are prohibited in all contractual relationships with suppliers.

4.3 Confidentiality

We shall not divulge outside the company any information about suppliers of a confidential and strategic nature, in turn requesting mutual conduct in this regard from our suppliers.

4.4 Anti-counterfeiting provisions

We carefully observe all intellectual property rights, regardless of whether they are held by our own company or by third parties. We therefore work to ensure, together with our suppliers, that none of the products sold by Claber in any way represents counterfeiting in relation to patents, models, plans, brands or other forms of property rights, currently existing or currently awaiting approval.

5. RULES OF CONDUCT FOR RELATIONS WITH CUSTOMERS, END CONSUMERS AND PROFESSIONALS

5.1 Customer Satisfaction and observance of commitments

Our business is aimed at the satisfaction and safeguarding of our customers, offering products, services and solutions that fully meet their expectations and agreements made.

We further undertake to observe the right of consumers not to receive products that are damaging for their health and physical well-being. At Claber, health and safety and respect for human rights and the environment are key underlying aspects of the solutions we offer.

5.2 Fairness and impartiality

The contractual relationship is based on correctness, transparency, truth and fairness, prohibiting exploitation of any weakness in negotiating position or lack of knowledge of the facts and conditions

in order to inappropriately influence customers during any negotiations. We undertake not to arbitrarily discriminate against our customers.

Gifts, benefits and payments in kind that may represent activity aimed at obtaining favours are prohibited in all contractual relationships with our customers in the public and private spheres.

We seek commercial partners and customers that in turn guarantee the principles of the Code of Ethics.

5.3 Transparency and full disclosure

We undertake to fully inform customers, end consumers and professionals of the characteristics, functions and prices of products and services through clear communications that are not misleading, enabling customers and consumers to make informed decisions.

5.4 Data protection and customer confidentiality

We guarantee that the information in our possession on customers, consumers and professionals is managed and used with full respect for the rights of individuals and applicable laws.

5.5 Anti-counterfeiting provisions

We carefully observe all intellectual property rights, regardless of whether they are held by our own company or by third parties. We therefore work to guarantee that none of the products sold by Claber in any way represents counterfeiting in relation to patents, models, plans, brands or other forms of property rights, currently existing or currently awaiting approval.

6. RULES OF CONDUCT FOR RELATIONS WITH PUBLIC ADMINISTRATION

We have relations with national, European and international public institutions, public officials and figures appointed to public service, which are founded on the principles of integrity, legality, transparency and impartiality. Contact in this regard is made only by those specifically and formally appointed by our Company.

We prohibit all promises of benefits, donations of money and offers of goods in kind, directly or indirectly, made to public officials and/or figures appointed to public service, which may give rise to an undue or unlawful advantage or benefit for our Company. In line with Company procedures, courtesy gifts of a modest value are permitted, along with payment of hospitality expenses, only if, considering the specific circumstances, they are such that they could not be considered as aimed at obtaining favours or privileges in breach of applicable laws.

Specifically, in the context of relations with the Public Administration, it is prohibited to:

- promise or hand over money for non-institutional purposes, directly or through intermediaries
- promise or apply favouritism in the hiring of personnel or in the selection of suppliers of goods and services
- produce documents and/or falsified or altered data or omit information due also in order to obtain authorisations, licences, concessions, grants, subsidies, funding or other elements from the state, public bodies or the European Community
- assign grants, subsidies or public funding for purposes other than those for which such support was awarded
- access IT systems of the public administration without authorisation to obtain or modify information to the benefit of our Company.

We reject any conduct aimed at obtaining, from the part of the state, European community or other public body, any form of financial support through altered or falsified declarations and/or documents or more generally through trickery or deception, including activity involving IT or electronic systems, aimed at misleading the issuing body.

In operations for tender procedures, contracts and applications for public or private funding, Claber shall not assign to illegitimate purposes or purposes other than those for which such support was awarded, any grants, subsidies or funding received from the state or other public body or the European community.

Where considered appropriate, Claber shall support programmes of public bodies aimed at collective benefit and utility, as well as the activity of foundations and associations, in accordance with applicable laws and the principles of the Code of Ethics.

7. RULES OF CONDUCT FOR RELATIONS WITH THE MEDIA

In accordance with the principles of transparency and completeness of information, Claber's external communications, of whatever form and including public appearances for live events of the Company, are rooted in respect for the right to information. In accordance with the principle of protecting the confidentiality of information, recipients of the Code of Ethics responsible for relations with the media must not issue false or partial news or comments, neither regarding Company operations nor the results of professional activity or relations with stakeholders in general.

With the firm belief that the operations and results of the Company are closely tied with responsible business conduct, external communication, including that aimed at promoting Claber's brand and image, is aligned with the principles of this Code of Ethics.

8. RULES OF CONDUCT FOR RELATIONS WITH THE PUBLIC AND LOCAL COMMUNITY

8.1 Rules of conduct for relations with the local community

We are aware of the influence, including indirectly, of our operations on the well-being of the public, as well as the importance of the social acceptance of the communities in which we operate. For this reason, we wish to invest sustainably, respecting local communities and supporting initiatives of cultural and social value in order to maintain a strong reputation and high level of social acceptance.

We are committed to a focus on the lives of communities in which we operate and listening to their requests. We run information, listening and engagement initiatives for this purpose. This applies particularly to the communities in the proximity of our current and future factories.

For our social and cultural initiatives and sponsorship more generally, we only consider initiatives aligned with the strategic goals of Claber, with the principles of environmental and social responsibility and with the aims set by the Board of Directors.

In the case of donations, Claber prioritises initiatives offering a guarantee of quality, which distinguish themselves for the ethical message they send and which, in line with the Company's mission, contribute to social development. In this context, we support projects of a social, educational, scientific, artistic, cultural and sporting character that benefit the collective.

8.2 Rules of conduct for relations with political and trade-union organisations

Claber does not provide funding of any type to political parties, movements, committees, political and trade-union organisations and candidates for election, and refrains from any form of undue pressure on public representatives aimed at gaining an advantage for the Company.

9. METHODS FOR APPLICATION OF THE CODE OF ETHICS

9.1 Whistleblowing

The Code of Ethics is required by Italian Legislative Decree 231/2001, which governs the administrative responsibility of Organisations deriving from the commission of the crimes listed by persons acting in the interests or for the benefit of the Company.

Claber's Code of Ethics is a binding tool for those working for and with Claber and, in this context, a system for implementation and verification of the principles set out has been adopted.

The Board of Directors is responsible for updating this Code of Ethics, subject to a proposal from the CEO, from the Audit Committee or on the basis of reports received.

The body assigned the task of verifying application of the Code of Ethics is the Supervisory Body, which coordinates with other departments and competent bodies for the correct implementation of the Code of Ethics and the Organisational Model. This body operates free from relationships of subordination or control and with impartiality, correctness and integrity.

Those who the Code of Ethics applies to are required to familiarise themselves with it and actively foster its implementation, suggesting areas for improvement to the appointed departments and/or reporting potential breaches. The Code of Ethics is shared with those it applies to through specific training and information, approved by the Supervisory Body.

Any breaches identified must be appropriately reported to the appointed figure, working at the main headquarters of the Fitt Group, following the indications of the "Whistleblowing Procedure" adopted by the Company on 01/12/2023 and published online at www.claber.com, via one of the following channels:

- via standard post to the headquarters of the Fitt Group at via Piave 8, 36066 Sandrigo, Vicenza, Italy
- by telephone and/or an in-person meeting with the figure appointed in accordance with the specific procedure
- via an anonymous report using the dedicated portal.

The figure appointed in accordance with the specific procedure, together with the Supervisory Body to which reports received by the Recipient may be sent, act on the basis of company procedures in order to avoid any form of retaliation, discrimination or penalisation against whistleblowers and ensuring the anonymity of whistleblowers and confidentiality regarding the reported facts, with the exception of legal obligations and protection of Claber's rights.

Managers are required to:

- set an example, demonstrating what integrity means through their own conduct
- communicate with their personnel to guarantee that everybody understands the Code of Ethics and has the resources to implement it
- support personnel who, in good faith, raise doubts and worries
- consistently apply the Code of Ethics.

9.2 Penalties

Observance of the rules set out in the Code of Ethics must be considered an essential component of the contractual obligations assumed by the parties involved.

Violation of the rules of conduct and principles contained in this Code of Ethics carries disciplinary penalties based on the seriousness of the case and the damage caused.

The procedures for formalisation and application of penalties, together with descriptions of the various types of applicable penalties are set out in the General Part of the Claber S.p.A Organisational Model pursuant to Italian Legislative Decree 231/2001.

The aforementioned disciplinary penalties that may be taken with regard to employees are defined by the National Collective Labour Agreement for personnel in the rubber, electrical-cables and plastic-materials industry.

With regard to breaches of the principles established by this Code of Ethics by customers, external personnel or suppliers, such events may lead to termination of contracts in place, without affecting the right for Claber S.p.A. to claim compensation for any damage suffered.

10. RELEVANT QUESTIONS FOR APPLICATION OF THE CODE OF ETHICS

Before acting, individuals should ask themselves “Could my conduct be...

- ...in breach of the Code of Ethics?
- ...considered dishonest, unethical or illegal?
- ...non-compliant with Claber’s policies, procedures and guidelines?
- ...damaging to Claber and its reputation if disclosed to the public?
- ...such as to provoke a loss of credibility for Claber in relation to employees, customers, suppliers, shareholders or the public?”

If the answer to any of these questions is YES or MAYBE, you are facing a potential ethical problem and should request advice from your manager, from human resources or from the Supervisory Body.

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The logo for Claber, featuring the word "claber" in a stylized, lowercase, bold font with a registered trademark symbol. The letters are white with a black outline, set against an orange background.

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