

	<b>CODE OF ETHICS</b>	POL.ZD.03
		Rev. 00
		07/04/2025

# **CODE OF ETHICS** **ZD ZOBBIIO MACCHINE UTENSILI SRL**

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## 1. PREMISES

This document is an excerpt from the Code of Ethics, which represents the formal declaration of the values, principles, and responsibilities that guide the activities of ZD ZOBIO MACCHINE UTENSILI SRL (hereinafter **ZD**). It applies to all individuals who work on behalf of the company, including employees, collaborators, business partners, suppliers, customers, and external stakeholders.

The goal is to promote a corporate culture based on **integrity, transparency, respect and social responsibility**, protecting people's rights and ensuring full compliance with current regulations.

### 1.1 Code of ethics and company principles

This Code of Ethics therefore expresses the set of ethical values and principles that inspire the behaviors, culture and corporate conduct that ZD recognizes, accepts and promotes in carrying out its business, namely:

- centrality of human resources
- protection of health and safety at work
- equal opportunities and non-discrimination
- legality and social value of business activity
- transparency and verifiability
- respect for fair competition and professional correctness
- honesty, integrity and fairness towards Customers, Suppliers, Employees, Collaborators, Commercial and Financial Partners and the Community
- protection of confidentiality and privacy
- Environment protection

These principles guide ZD in its daily activities, internal and external relationships, and in building a solid, ethical, and sustainable corporate identity. Each value expressed serves as a point of reference for all employees, at every level, and reflects the company's ongoing commitment to excellence and responsibility.

#### Reliability

ZD operates with consistency, punctuality, and responsibility, honoring its commitments to customers, collaborators, and partners. Reliability is recognized as a key element in building lasting relationships of trust.

#### Communication

The company promotes clear, transparent, and respectful communication, believing it to be essential to the smooth functioning of the organization. Each employee is encouraged to actively listen and share information in a timely and constructive manner.

#### Excellence

ZD is committed to pursuing the highest quality standards in every process, product, and service. Excellence is not seen as a goal, but as a continuous journey of improvement and exceeding expectations.

#### Commitment in the tension towards the result

Results-oriented thinking is a key component of the company culture. Each person is called upon to act with determination, responsibility, and initiative, contributing concretely to the achievement of shared goals.

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## Innovation

ZD considers innovation a strategic element for competitiveness and growth. The company values new ideas, critical thinking, and openness to change, promoting effective and sustainable solutions.

## Working in team

Teamwork is recognized as a key factor in business success. ZD encourages collaboration, sharing of skills, and mutual support among employees, in a climate of trust and respect.

## Respect

All activities are conducted with full respect for people, laws, the environment, and diversity. Respect is the foundation of internal and external relationships and is reflected in correct, inclusive, and ethical behavior.

## Honesty

ZD operates with honesty and transparency, fostering a work environment based on loyalty and mutual trust. Honesty is considered essential for building authentic and responsible relationships.

### 1.2 Scope of application

This Code of Ethics applies to all ZD employees and business partners, who undertake to share and promote its contents in order to effectively pursue the corporate objective outlined above.

To this end, ZD intends to share its principles with all its stakeholders (so-called Recipients) with whom it has business relationships to achieve its Mission.

In particular:

- Shareholders: this group includes the Members and all other stakeholders who own company shares;
- Stakeholders: this class includes, among others, Employees, Directors, Collaborators in the broad sense, the Public Administration, Customers, Suppliers of goods and services, Competitors, Political and Trade Union Organizations, Information Bodies, the Environment and the Territory.

In this perspective, ZD is committed to:

- ensure the dissemination of the Code to all its Recipients by publishing an Extract on its website, physical and/or electronic company noticeboards and/or by delivering a paper copy
- Guarantee that all updates and changes are promptly communicated
- provide adequate training and information support on the contents of the Code
- ensure that anyone who reports violations of the Code in good faith is immune from retaliation;
- promote compliance with the Code of Ethics and company policies
- adopt fair, consistent and commensurate disciplinary measures for the type of violation of the Code

**Compliance with the provisions of the Code is an essential part of the obligations of ZD personnel.**

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### 1.3 Implementation, control and monitoring

Compliance with the Code of Ethics is an integral part of the contractual obligations of Employees, Collaborators and, more generally, of all Recipients.

### 1.4 Reports, disciplinary measures, whistleblowing and harassment

In compliance with Law no. 179 of 30/11/2017 on the so-called Whistleblowing, ZD has set up several information channels aimed at allowing the communication of irregularities or violations of this Code to those who have become aware of them by virtue of their duties.

The communication channels designed to ensure the confidentiality of the whistleblowing's identity are:

- By ordinary post: Alla c.s. ODV di ZD ZOBbio MACCHINE UTENISILI SRL, via Cavezzo 8, 25045 – Castegnato (BS)
- By e-mail: [odvzdzobbio@gmail.com](mailto:odvzdzobbio@gmail.com)

The **reports** must be: detailed, relevant in accordance with the aforementioned decree and based on precise and consistent factual elements, or relating to violations of the organization and management model of the entity.

**Iter:** Once received, reports are recorded in a special register (the so-called Reporting Register). An internal investigation is then conducted into the reports.

The Supervisory Board is required to report any violations discovered and any changes/additions deemed necessary to the Board of Directors, which then evaluates the reported violations and adopts any appropriate disciplinary measures.

The entire process is formalized in a Final Report to be included in the aforementioned Register.

**ZD** is committed to ensuring:

- the confidentiality of the whistleblower's identity in reporting activities;
- the protection of the whistleblower from retaliatory or discriminatory acts, direct or indirect, for reasons related, directly or indirectly, to the report;
- the application of sanctions against those who violate the whistleblower's protection measures;
- the application of sanctions against those who, with intent or gross negligence, submit reports that prove to be unfounded.

**Sanction.** Any conduct (consummated or attempted) undertaken in violation of this Code of Ethics will be punished by the application of a proportionate, effective and dissuasive sanction in accordance with the internal Disciplinary and Sanctioning System.

Failure to comply by external parties may result in the termination of the contract, assignment or in general of the relationship in place with the Company, as well as - where the conditions exist - compensation for damages.

**ZD** appreciates any input from company *stakeholders* to improve the Code.

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## 2. ETHICAL PRINCIPLES

The following principles guide the conduct of the company and its employees, with the aim of ensuring transparency, respect, responsibility, and sustainability in every aspect of work.

### 2.1 Health, Safety and Environment

Protecting the health and safety of its workers, customers, and all collaborators and parties involved in its operations is of primary importance to ZD. To this end, ZD is committed to complying with current health and safety legislation (Legislative Decree 81/08) and adopting all necessary measures to prevent accidents, injuries, and illnesses.

### 2.2 Gender equality and *Diversity*

ZD aims to ensure equal opportunities at all stages of the employment relationship, committing to combat any form of direct or indirect discrimination based on gender, sexual orientation, ethnicity, religion, age, disability, or any other personal characteristic. ZD's goal is to promote an inclusive and respectful work environment that also fosters a work-life balance for its employees.

### 2.3 Conflict of interest, gifts

Every employee has the duty to avoid situations that could create conflicts between personal interests and those of the company. ZD prohibits any behavior aimed at influencing the impartiality of company decisions. Furthermore, the acceptance or offer of gifts, benefits, or other advantages aimed at obtaining undue advantages is prohibited.

### 2.4 Corruption and illicit payments

ZD and all recipients of this Code are committed to the highest standards of integrity, honesty, and fairness in all relationships within and outside the company, in accordance with national and international anti-corruption laws. The company cooperates fully with regulatory and government bodies within their legitimate scope of activity, including allowing legitimate inspections.

ZD adopts a zero-tolerance policy towards all forms of corruption, both active and passive. The promise, offer, or acceptance of money or other benefits to obtain improper advantages is prohibited. Furthermore, all payments must be traceable, justified, and documented.

### 2.5 Accounting and cash-flow

Accounting and financial management must be accurate, transparent, and compliant with applicable accounting principles. All transactions must be properly recorded and supported by adequate documentation. Cash flows must also be always traceable.

### 2.6 Fair competition e Antitrust

ZD promotes fair competition and is committed to complying with antitrust laws. It also prohibits any unfair practices aimed at hindering competition or gaining unfair advantages to the detriment of customers, suppliers, or competitors. Specifically:

- Its commercial policy is independent and does not set prices in agreement or collusion with its competitors;
- It does not allocate customers, territories, or markets in agreement or in agreement with competitors.
- It establishes fair relationships with its customers and suppliers, in compliance with competition laws

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## 2.7 Intellectual property and confidentiality obligation

All ZD employees are required to respect the intellectual property rights of the company and third parties. Information acquired in the performance of their duties must be treated with the utmost discretion and confidentiality, avoiding any unauthorized disclosure, even after termination of employment. All recipients of this Code must refrain from:

- using (or disclosing to unauthorized third parties) non-public information acquired in the performance of their duties for personal gain or to favor third parties;
- using, in an unlawful and/or improper manner, in the interests of the company or third parties, intellectual property, or parts thereof, protected by copyright infringement legislation.
- engaging in acts of competition involving violence or threats against competing companies and, more generally, engaging in any conduct that is not characterized by fairness and loyalty, including towards competitors;
- purchasing and/or distributing counterfeit goods or goods lacking the declared qualities, and, in any case, without having carried out the appropriate checks;
- deliver to buyers products that are different in origin, provenance, quality or quantity than those agreed.

## 2.8 Environmental protection in work processes

The company is committed to integrating environmental sustainability criteria into its production and management processes, promoting the efficient use of resources, waste reduction, and the adoption of low environmental impact practices.

## 2.9 Environmental impact and product safety

The design and production of products or services must take into account user safety and environmental impact throughout their life cycle. The company is committed to complying with the quality and safety standards required by current legislation and its own ethical commitments.

## 2.10 Privacy

All personal data processed by the company must be managed in full compliance with personal data protection legislation (e.g., EU Regulation 2016/679 - GDPR). Each employee is required to ensure the confidentiality and security of the information processed.

# 3 RULES OF CONDUCT

Below are listed the rules of conduct that ZD promotes within its work environment and which govern the behavior of ZD's employees, management, and business partners.

## 3.1 Relationship in the work place

ZD promotes a work environment based on mutual respect, inclusion, and collaboration. Any form of discrimination, harassment, or behavior that undermines personal dignity is strictly prohibited. Professional relationships must be characterized by fairness, transparency, team spirit, and respect for diversity.

ZD adheres to the UN Universal Declaration of Human Rights and the fundamental Conventions of the International Labour Organization (ILO), which confirm the importance of respect for the individual, guarantee equal treatment, and exclude any form of discrimination:

- **Discrimination and/or harassment**
- **Equal employment opportunities**
- **Child labor**

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### 3.2 Relationship conducted by Employees staff

Relationships conducted by ZD employees are characterized by integrity, consistency, and loyalty, and are free from conflicts between corporate and personal interests. In this regard, ZD requires all its employees to adhere to the highest standards of fairness in business relationships, as established in this Code, its internal policies, and the MOG (pursuant to Legislative Decree no. 231/01).

### 3.3 Relationship with suppliers and collaborators

Relationships with suppliers and collaborators must be based on honesty, transparency, and mutual respect. Supplier selection must be based on objective criteria of quality, reliability, competitiveness, and compliance with ethical standards. Conduct that could constitute corruption or favoritism is not tolerated, subject to termination of the relationship.

### 3.4 Relationship with public institutions

Relationship with the Public Administration must be managed with the utmost fairness, transparency, and compliance with the law. It is forbidden to promise or offer benefits to public officials in order to obtain preferential treatment. All contacts with institutions must be authorized and documented.

### 3.5 Relations with trade unions and political parties

ZD maintains impartiality toward trade unions and political parties. The company's name or resources may not be used to support political or trade union activities. Relations with these entities must be based on dialogue, respect, and transparency.

### 3.6 Relations with media

Relations with the media are reserved exclusively for authorized company functions. External communications must be accurate, truthful, and consistent with the company's image and values. Un-authorized disclosure of confidential or false information is prohibited.

### 3.7 Relationship with customer

ZD is committed to ensuring maximum customer satisfaction through the quality of its products and services, compliance with contractual commitments, and transparency. Customer relationships must be characterized by courtesy, competence, and integrity, in full compliance with applicable regulations and privacy.

### 3.8 Relations with Supervisory Bodies and Judicial Authorities

ZD cooperates fairly and transparently with supervisory bodies and judicial authorities. All requests must be handled promptly, accurately, and completely. All employees are required to provide truthful information and not to hinder the work of the competent authorities.