



Ethical Code

Approved by the Sole Director of Litokol Lab on September 1st, 2025

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1. Our Ethical Code

The Ethical Code of Litokol Lab S.p.A. (hereinafter “Litokol” or the “Company”) expresses the ethical commitments and responsibilities in the conduct of business and corporate activities, undertaken by the Company and, therefore, by its directors, employees, and collaborators in every capacity.

Litokol firmly believes that ethics in conducting its business is an indispensable condition for success, a tool for promoting its corporate image, and an essential asset of the Company.

For this reason, Litokol has chosen to adopt this Ethical Code (hereinafter also the “Code”) which, in line with the principles of fairness, loyalty, and honesty already shared by the Company, is intended to regulate corporate conduct through behavioral rules.

This Ethical Code forms an integral and substantial part of the Organization, Management, and Control Model adopted by Litokol Lab S.p.A. pursuant to Italian Legislative Decree 231/2001.

The 231 Model aims to prevent the commission of predicate crimes provided for by the law, thus safeguarding the Company, its directors, employees, and collaborators.

Compliance with the principles and rules contained in the Ethical Code is an essential condition for the effective implementation of the 231 Model and for the proper functioning of the Company’s compliance system.

Supervision of compliance with the Ethical Code and the functioning of the 231 Model is entrusted to the Supervisory Body (OdV), which:

- monitors the implementation of the 231 Model and the Ethical Code;
- receives reports of possible violations;
- proposes periodic updates to corporate governance;
- guarantees independence, autonomy, and continuity of action.

The Ethical Code of Litokol applies to all directors, managers, employees, collaborators, as well as to the control bodies of Litokol (hereinafter the “Recipients”). Litokol also requires that all major stakeholders conduct themselves in line with the general principles of the Code.

This Code consists of:

- ✓ monitors the implementation of the 231 Model and the Ethical Code;
- ✓ receives reports of possible violations;
- ✓ proposes periodic updates to corporate governance;
- ✓ guarantees independence, autonomy, and continuity of action.

To ensure the Code is known and effective for all employees, collaborators, and third parties external to the Company, Litokol publishes it on the Company’s website and posts it on company notice boards.

The Code will be delivered to all new employees and collaborators during the hiring process and, in any case, disseminated to all those who interact with the Company.



2. The Litokol Manifesto

We are here to create extraordinary products.

We believe our purpose is to make great products.

We constantly focus on innovation.

We believe in what is simple, not in what is complex.

We own and control the core technologies behind the products we create, and we operate only in sectors where we can make a truly significant contribution in terms of innovation.

We believe in saying no to hundreds of research projects, so that we can truly focus only on the few that are most important and meaningful to us.

We believe in deep collaboration and the cross-pollination of ideas among our teams, which allows us to innovate in ways that others cannot.

And we settle for nothing less than excellence.

***« When perfection becomes an obsession,
extraordinary things are born »***

3. Litokol – Who We Are

Litokol is the hi-tech benchmark in providing state-of-the-art technologies, products, and solutions for the installation of ceramic tile and natural stone systems, as well as for continuous design surfaces.

It is a laboratory of experimentation and advanced research dedicated to innovation, where some of the world's most innovative ceramic installation products are developed — science-driven and designed to help professional installers improve their performance on job sites across every continent, offering them unprecedented safety and a unique sensory experience.

Litokol's main activities include:

- ✓ Conception, design, development, production, and commercialization of innovative formulations — some patented or patent-pending — intended for substrate preparation, waterproofing, installation, finishing, and maintenance of ceramic coverings.
- ✓ Provision of know-how on products, as well as consulting, technical support, and on-site installation services for architects, civil engineers, project managers, and professional flooring installers.
- ✓ Conception, design, development, production, and commercialization of innovative patented formulations for the creation of solid continuous surfaces inspired by nature.
- ✓ Training, technical updating, and professional development of Pro installers, educating them on the advantages of new ultra-performing Gel technologies..

Mission

Litokol's mission is “to create the best technologies in the world that enhance the performance of professional installers” through the development of cutting-edge, innovative products and services. This translates into:

- Technology creation: developing technologically advanced products with innovative performance.
- Installer empowerment: providing installers with tools to improve their performance on job sites, making technology accessible and easy to use.
- New sensory/gel experience: designing products that enhance the application experience, offering unique, intuitive, and smart solutions.
- Sustainability: committing to a more sustainable future by reducing environmental impact.

Vision

Litokol's vision is to radically innovate in order to create the best products for ceramic installation systems — products that are simple to apply yet powerful, effective, and ultra-performing — with the goal of delivering greater value to professional installers.

Sustainability

Litokol's approach to sustainability is closely aligned with its corporate Mission and Vision. The pursuit of uncompromising quality is consistent with the goals of sustainable development: developing smart Gel technologies produced exclusively with 98% Italian raw materials, sourced and processed within a 250 km radius of the headquarters in Rubiera, Italy.

Litokol's expertise in engineered hybrid cements has made it possible to develop new formulations with low or ultra-low Portland cement content, adopting a radically hyper-local approach to sustainability and demonstrating that a responsible chemical industry is indeed possible.

4. Values and Commitments

Litokol shares a set of guiding Values and Corporate Commitments, already defined within the Company, aimed at ensuring responsible and attentive management of its activities and its interactions with all stakeholders..

Technology

Litokol is focused on creating and spreading technologies that transform the installation of ceramic tiles — promoting a new technical culture and higher levels of safety available to the ceramic industry worldwide.

Innovation

Litokol combines dedication and vision, technology and creativity, where innovation becomes reality and generates new solutions. The goal is to provide advanced, sustainable, and ultra-performing adhesive interfaces that improve the overall quality of ceramic installation.

Innovation is the cornerstone of Litokol's corporate philosophy, essential in defining the Company's strategic objectives, and reflects its commitment to creating shared value with all stakeholders.

Dignity and Equality

Respect for the individual — regardless of their position in society or in the production system — and the rejection of any form of abuse, exploitation, or discrimination are an essential part of Litokol's responsibility toward people.

In hierarchical relationships, Litokol requires that authority be exercised with fairness and prohibits behaviors that could unduly favor or disadvantage any worker in their role and dignity.

The Company guarantees equal opportunities, protection, and development of human resources wherever they operate, recognizing them as a primary factor of success and, above all, as holders of the right to fair treatment — respectful of each individual's uniqueness and aimed at safeguarding their physical and psychological integrity.

Legality

Litokol regards compliance with national and international regulations as a binding and indispensable condition of its conduct.

The Company is therefore committed, also through careful prevention of unlawful acts, to complying with applicable laws as well as with generally recognized international practices.

Through the implementation of the Codes and Models defined by its corporate Governance, as well as the Management Systems for Quality, Environment, Social Responsibility, and Health and Safety in the workplace, Litokol ensures the monitoring and respect of all applicable laws and regulatory requirements.

“It is Litokol's intention to develop its business not only in compliance with the law, but also with fairness and integrity, regardless of legal obligations.”

Morality

Honesty, fairness, and transparency must guide relationships with all stakeholders, ensuring that the interests of one party are not violated to the advantage of another.

In its dealings with third parties, the Company is committed to acting correctly, avoiding misleading information and any conduct that might take undue advantage of situations of weakness or lack of knowledge.



In carrying out their duties, each Recipient must conduct themselves with moral integrity, taking into account the various social, economic, political, and cultural contexts of reference and, in particular, the following principles:

- ✓ honesty, fairness, and good faith, assuming the responsibilities connected to their role and tasks;
- ✓ transparency, handling information in their possession promptly and implementing communication and information processes guided by clarity, completeness, accuracy, and sharing, while respecting the potential confidential nature of such information.

***“Litokol expects sincerity, honesty, and fairness
from its employees in every behavior.”***

Confidentiality

Litokol guarantees the confidentiality of the information in its possession and refrains from seeking out or using confidential data or information, except in cases of explicit and informed authorization..

5. Behavioral Guidelines

Business Relations

OUR CLIENTS

The client has absolute priority over every activity of the Company. Litokol is committed to building a deep and long-lasting relationship with its clients through:

- ✓ identifying and meeting their needs, including latent ones;
- ✓ the ability and commitment to honor the promises made and the expectations created;
- ✓ attention to transparency in order to avoid any kind of misunderstanding.

“Clients are an integral part of Litokol’s corporate assets.”

To strengthen trust and, consequently, client loyalty, relationships with them must be conducted by each Recipient according to principles of legality and morality, in full respect of professionalism and integrity.

To this end, Recipients are required to carry out their activities toward clients with competence, accuracy, prudence, judgment, dedication, and efficiency, as well as with honesty, loyalty, availability, and transparency.

By way of example, Recipients are required to:

1. *Provide clients with accurate, precise, and comprehensive information regarding the goods and services offered by Litokol.*
2. *Not use false or misleading statements in the sale or marketing of its products and services. Information disclosed must be accurate and truthful in advertising and public statements.*
3. *Ensure that promotions for products and services are fair, accurate, and consistent with applicable laws. Objective statements must be fact-based.*
4. *Conduct business only with clients willing to provide the necessary information to verify the legitimacy of their business activities and the origin of the funds used..*

The Company includes in agreements with clients contractual clauses that bind them to compliance with fundamental principles and, taking into account their legal, social, economic, and cultural frameworks, to respect the provisions of this Code.

OUR SUPPLIERS

Over the years, Litokol has established a close collaboration with its suppliers, fostering frequent and direct interactions that have ensured high-quality work, full respect for people, and the protection of working environments.

“In order to ensure the constant improvement and continuous growth of its relationship with suppliers, Litokol has defined reference values and specific supplier development policies.”

To strengthen trust and, consequently, supplier loyalty, relationships with them must be conducted by each Recipient according to principles of legality and morality, in full respect of professionalism and integrity.

To this end, Recipients are required to conduct their activities toward suppliers with competence, accuracy, prudence, judgment, dedication, and efficiency, as well as with honesty, loyalty, availability, and transparency..

By way of example, Recipients are required to base the selection of suppliers on

1. *on compliance with the principles of impartiality and independence;*
2. *on the basis of objective requirements of integrity, quality, efficiency, and cost-effectiveness;*

3. *by ensuring sufficient competition for every supply request;*
4. *on the prior analysis of available information, including financial data, in order to ascertain the suppliers' reliability and the legitimacy of their activities before establishing business relationships with them.*

Supplier registers established within the Company must never constitute a reason for excluding supplier companies not included in them, provided that such companies can demonstrate possession of the necessary requirements to meet the Company's expectations.

Litokol and its collaborators are fully committed to avoiding involvement in activities that could imply money laundering (i.e., the acceptance or processing of proceeds deriving from criminal activities in any form or manner).

Litokol includes in agreements with suppliers contractual clauses binding them to the respect of fundamental principles and, taking into account their legal, social, economic, and cultural context, to compliance with the provisions of this Code.

COMPETITORS

Litokol recognizes that competition is a fundamental element for the economic and social development and progress of the country.

To this end, in carrying out its business, the Company ensures compliance with the general conditions for freedom of enterprise, enabling economic operators to access the market and compete on equal terms, while also protecting its clients by promoting price containment and improvements in service quality that result from free competition.

By way of example, Recipients are required to:

1. *Comply with the regulations on fair competition and antitrust.*
2. *Report behaviors whose object or effect is to prevent or restrict competition in the market, including but not limited to:*
 - 2.1. *establishing relationships with Litokol's competitors to reach agreements on purchase or sales prices, on quantities, or on other contractual conditions;*
 - 2.2. *entering into agreements or even verbal understandings of non-competition with Litokol's competitors;*
 - 2.3. *agreements for participation in tenders or for the division of markets or sources of supply (including clients, territories, or production programs).*

The sale of the Company's products and services must take place solely on the basis of their merits and the benefits they offer. This Code does not allow the false denigration of competitors or their products and service.

PARTNERS

When the Company participates in initiatives jointly with other entities, whether through the establishment of joint ventures with one or more partners or by acquiring shares in companies with other shareholders, Recipients are required to:

1. *establish relationships only with partners or other shareholders with a commercially reliable reputation, who are guided by ethical principles comparable to those of the Company and who operate in line with this Code;*
2. *ensure the transparency of agreements and avoid signing secret pacts or agreements that are contrary to the law.*

RELATIONS WITH GOVERNMENTS AND PUBLIC INSTITUTIONS

Relations with Public Administration are subject to specific attention, which translates into a system of general controls and controls over individual activities identified as "sensitive," such as the execution of contracts for the sale of goods and services to public entities, and the negotiation and stipulation of contracts for the sale of goods and services with public entities, both in Italy and abroad, through public tenders and/or private negotiations.

By way of example, Recipients are required to comply with the following principle:

1. *operations must always be carried out in compliance with the law and correct business practices, with the explicit prohibition of behaviors that, in order to benefit the Company or pursue its interests, might constitute criminal offenses;*
2. *during any business negotiation, request, or relationship with Public Administration, employees, collaborators, and all those acting on behalf of the Company must not attempt to improperly influence decisions or induce executives, officials (including those who negotiate or make decisions on behalf of Public Administration), employees of Public Administration, or their relatives or cohabitants to act in violation of their official duties, even if such actions are intended to benefit the Company.*

By way of example, and without limitation, Recipients of the Code must not, either directly or indirectly:

1. *examine or propose employment and/or business opportunities that might personally benefit employees of Public Administration;*
2. *offer or provide money, gifts, or gratuities in any form.*
3. *exert unlawful pressure or promise any item, service, or benefit;*
4. *submit false statements to national or EU public bodies in order to obtain public funds, contributions, or subsidized financing, or to obtain concessions, authorizations, licenses, or other administrative acts;*
5. *tamper with the functioning of an IT or telematic system or manipulate the data contained therein to obtain undue profit, causing harm to Public Administration;*
6. *use funds received from public bodies as grants, contributions, or financing for purposes other than those for which they were assigned;*
7. *solicit or obtain confidential information that might compromise the integrity or reputation of either party.*

The key to Litokol's success lies in the quality of the products and services it offers to the community and its clients. Consequently, Litokol rejects corruption, as it hinders progress and innovation, distorts competition, and harms the community.

Corruption leads to decisions based on non-objective factors; therefore, Litokol confirms its commitment to fighting corruption in every form, with zero tolerance toward such phenomena, by constantly strengthening the degree of integrity and transparency in internal behaviors so as to positively influence its reputation in the contexts in which it operates.

The behavioral rules adopted by Litokol are based on compliance with the law and are inspired by the principles established by the OECD International Convention on Combating Bribery and by the Italian National Anti-Corruption Authority (ANAC).

For corruption is meant the obtaining, or the attempt to obtain, a personal benefit or advantage of any kind through improper and illegal means. Corruption, in any form, including attempted, is prohibited.

By way of example, Litokol prohibits the following behaviors:

1. *offering, promising, giving, paying, or authorizing someone to give or pay, directly or indirectly, an economic advantage or other benefit to third parties,*
2. *accepting requests from, or solicitations by, or authorizing someone to accept or solicit, directly or indirectly, an economic advantage or other benefit from third parties, when the intention is to induce a third party to improperly perform any activity related to a business, or to reward them for having performed it, or to obtain, secure, or maintain a business or an undue advantage in relation to business activities, or, in any case, to violate applicable laws.*

The prohibition includes the following practices, when carried out for corrupt purposes:

- ✓ *representation expenses, for hospitality or similar;*
- ✓ *the granting of in-kind contributions, including sponsorships;*
- ✓ *the promise of employment or other business or investment opportunities;*
- ✓ *the granting of discounts or personal loans;*
- ✓ *offering assistance or support to family members;*
- ✓ *the provision of gifts, benefits, or other utilities*



GIFTS, BENEFITS, OR OTHER UTILITIES

Litokol recognizes that gifts, benefits, and hospitality initiatives can be part of institutional and commercial relationship management activities and are permitted provided they remain within the scope of good faith, reasonableness, and proportionality.

In carrying out their duties, Recipients are prohibited from offering or granting to third parties, as well as from accepting or receiving from third parties, directly or indirectly, gifts, benefits, or other utilities (including sums of money, goods, or services of various kinds) that could influence or give the impression of influencing business decisions in favor of any person with whom the Company has business relations, except for gifts of modest value as defined in Litokol's anti-corruption policy. Such gifts must be directly attributable to normal commercial courtesy and, in any case, must not create in the other party, or in an unrelated and impartial third party, the impression that they are intended to obtain or grant undue advantages, or otherwise give rise to the perception of illegality or immorality.

Any Recipient who receives gifts or offers of gifts not in compliance with the above must immediately inform their manager in writing so that appropriate measures may be taken.

Recipients are strictly prohibited from soliciting the offer or granting, or the acceptance or receipt, of gifts of any kind, even if of modest value.

Any Recipient who, in the course of their duties, enters into contracts with third parties must ensure that such contracts do not provide for or imply gifts in violation of this Code.

HUMAN RIGHTS

We want to build a global company that is inherently diverse, fair, and inclusive. For Litokol, "Innovation" means actively and concretely contributing to the improvement of the company in all its forms: respect for the individual, protection of labor, diversity and equal opportunities, employee well-being, and the social development of the environment in which we work.

Litokol operates with the utmost respect for the value of the individual and in observance of human and labor rights as enshrined in national and international conventions and declarations, including the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as in full compliance with applicable laws and regulations.

Litokol recognizes the central importance of human rights and decent work not only within its own organization but also throughout its entire supply chain.

In line with EU Directive 2022/2464 on Corporate Sustainability Due Diligence, the Company is committed to:

- conducting due diligence activities on its suppliers and subcontractors;
- including in contracts compliance clauses regarding human rights, safety, and environmental principles;
- periodically monitoring suppliers through audits and risk assessments;
- adopting corrective measures and, if necessary, suspending business relationships with non-compliant partners.

RULES ON HUMAN, OCCUPATIONAL, AND SOCIAL RIGHTS

Litokol guarantees the following rights and/or obligations:

- ✓ Prohibition of child labor
- ✓ Prohibition of forced or compulsory labor
- ✓ Prohibition of illegal labor and clandestine immigration
- ✓ Respect for trade union affiliation rights
- ✓ Respect for diversity and equal opportunities
- ✓ Absolute rejection of any form of abuse
- ✓ Right to privacy

- ✓ Professional growth
- ✓ Fair remuneration
- ✓ Respect for employees' rest periods
- ✓ Safety, health, and hygiene in the workplace
- ✓ Rejection and condemnation of workplace harassment
- ✓ Effective communication and teamwork

“Passion and optimism, integrity and humility, customer satisfaction and speed, teamwork and internationalization, the taste for challenge and determination, leadership and people development are the core guiding Values at the foundation of Litokol’s cultural system”

SELECTION, DEVELOPMENT, AND PROFESSIONAL TRAINING

In the selection and management of personnel, the Company adopts criteria based on:

- ✓ merit;
- ✓ competence;

assessing individual skills and potential and rewarding success in a transparent manner. Litokol ensures that the evaluations of Recipients are not based solely on results but also on the way in which those results are achieved. Litokol guarantees all employees the signing of a regular contract that complies with all applicable regulations of the country of reference and is consistent with the Italian CCNL for SMEs in the chemical sector with regard to working hours, for example in Italy.

EQUAL OPPORTUNITIES

Litokol is consistently committed to respecting diversity and equal opportunities and to preventing all forms of discrimination.

The Company undertakes to operate in an environment free from discrimination of any kind (racial, cultural, ideological, sexual, physical, moral, religious, etc.), and to offer equal opportunities and conditions to all employees, collaborators, and stakeholders.

The following are strictly prohibited:

1. engaging in behaviors that may create an intimidating or offensive environment toward colleagues or collaborators, or harm the sensitivity of others, including sexually oriented behaviors (such as unwanted physical contact, gestures and statements with sexual connotations, or the display of images);
2. taking retaliatory actions against any employee who, in good faith, opposes or reports cases of discrimination, harassment, or personal offense;
3. implementing discriminatory policies in the processes of talent acquisition and compensation.

HEALTH AND SAFETY IN THE WORKPLACE

Respect for the individual, protection of labor, health, safety, and worker well-being, as well as the social development of the context in which we operate, are primary values for Litokol.

Every day, Litokol demonstrates its commitment through the monitoring of its processes, implementing tools that guide all people in adopting safe behaviors, and providing expertise, instrumental and financial resources aimed at continuous improvement in the field of health and safety.

Litokol is committed to disseminating and consolidating a culture of workplace safety that builds awareness of risks and promotes responsible behavior by all Recipients.

We act to safeguard, especially through preventive measures, the health and safety of workers also by defining and implementing appropriate reference standards.

In order to ensure compliance with legal obligations under Legislative Decree 81/08, Litokol prepares and updates the Risk Assessment Document (DVR), aimed at identifying workplace risks and establishing appropriate intervention and adaptation plans to minimize impacts on people, in collaboration with the Head of the Prevention and Protection Service (RSPP). The DVR also describes the risk assessment methodology, the evaluation, and the list of measures to be implemented. For each identified risk, a specific assessment is recorded, with an indication of monitoring frequency and corresponding corrective actions. Following the identification and classification of corporate risks in the DVR and the definition of a plan of interventions and actions to mitigate impacts, the RSPP and the Company Doctor carry out activities to ensure the application of these indications to the corporate context, including health surveillance for workers and workplace inspections for evaluation and monitoring. The Safety Organization also includes persons responsible for implementing the employer's provisions (safety managers) and supervisors in charge of monitoring, as well as a corporate emergency team trained to intervene in case of fire and to administer first aid.

This system ensures the identification of technical and organizational measures and the application of specific codified procedures.

We implement technical and organizational measures through:

1. risk and safety assessment;
2. continuous risk analysis and identification of critical processes and resources to be protected;
3. control and updating of work methodologies;
4. definition and implementation of training and communication initiatives aimed at all organizational levels;
5. promotion of workplace health and safety also through actions involving the active participation of Recipients.

The responsibility of each Recipient toward their collaborators and colleagues makes it mandatory to exercise maximum care in preventing accident risks.

The design of workplaces, technical measures, equipment, and processes are guided by the highest level of compliance with current health and safety regulations.

All Recipients are constantly reminded to comply with rules and procedures to safeguard their own safety and that of their colleagues.

“Recipients collaborate with one another in achieving common goals and are committed to creating a calm, stimulating, and rewarding work environment”

Litokol, in order to ensure the well-being, health, and safety of its employees and collaborators, is committed to:

- ✓ Sharing expertise, instrumental and financial resources aimed at continuous improvement in the field of health and safety.
- ✓ Designing workspaces and environments in full compliance with the highest standards of current health and safety regulations.
- ✓ Implementing ongoing health and safety training programs dedicated to its employees.
- ✓ Encouraging proactivity and employee participation through the reporting of potential hazards.
- ✓ Analyzing and implementing activities aimed at mitigating identified potential risks.
- ✓ Consolidating over time the health and safety management process, improving its performance.

CONFLICT OF INTEREST

In carrying out their duties, Recipients must avoid situations of conflict of interest.

“Decisions must be made solely in pursuit of Litokol's interests”

Any situation that could potentially give rise to a conflict of interest, or otherwise compromise the Recipient's ability to make decisions in the best interest of the Company, must be immediately reported to their Manager. The Recipient in question is then required to refrain from carrying out any acts connected with or related to such a situation.

ENVIRONMENT

Litokol consistently pursues its commitment to reducing its environmental impacts, an essential condition to ensure people's health and quality of life.

The Company integrates environmental, social, and governance (ESG) principles into its strategy.

To avoid the risk of greenwashing, every statement regarding environmental and social matters must be supported by official data and certifications.

In particular, the Company is committed to:

- adopting certified environmental management systems (e.g., ISO 14001)
- developing life cycle assessments (LCA) and environmental product declarations (EPD);
- communicating results in a transparent and verifiable manner;
- promoting a sustainability approach along the entire value chain, including suppliers and partners.

The Company contributes, in appropriate forums and through its industrial activities, to the promotion of scientific and technological development aimed at environmental protection and the safeguarding of natural resources.

The Company and all employees act in accordance with current laws and regulations to protect the environment and reduce pollution.

“We adopt eco-friendly methods throughout the entire life cycle of our products and promote environment-friendly initiatives”

Litokol's commitment is expressed through the implementation of the following actions:

1. Energy-saving initiatives.
2. Control and monitoring of consumption.
3. Optimization of logistics (transport and distribution management).
4. Minimization of water resource waste.
5. Packaging redesign, which includes: reducing packaging weight, minimizing over-packaging throughout the supply chain, reducing the use of mixed materials, and increasing recycled content.
6. Monitoring the use of chemicals in operational activities and along the entire value chain.

ACCOUNTING AND INTERNAL CONTROLS

The Company recognizes the primary importance of internal control for proper management and for the reliability, accuracy, transparency, and credibility of corporate information.

Each employee and every corporate function is responsible for the truthfulness, authenticity, and originality of the documentation and information handled.

The Company strengthens its internal control system by introducing more structured verification tools:

- Periodic audits (internal and external) to verify compliance with the Ethical Code, Organizational Model 231, and company policies;
- Annual compliance assessments, with ethical and sustainability performance indicators;
- Anonymous feedback collected from employees, to promptly identify areas of risk or organizational issues;
- Periodic reporting to the Supervisory Body (OdV) and the Board of Directors

Furthermore, in order to ensure the proper maintenance of mandatory accounting records, the correct preparation of the financial statements, reports, schedules, and corporate communications in general, and the regular activities of internal and external control bodies as well as Public Authorities, the Company requires its directors, employees, and third parties acting on its behalf to comply in particular with the following principles:

- Truthfulness, completeness, and transparency of accounting, financial, and corporate information, avoiding any form of falsification, alteration, or omission of significant data;
- Traceability and documentation of every economic and financial transaction, ensuring its verifiability, consistency, and compliance with applicable regulations and internal procedures;
- Compliance with civil, tax, and sector regulations, as well as applicable national and international accounting principles;
- Fair and timely cooperation with internal and external control bodies, as well as with the competent Public Authorities, supporting the conduct of inspection and supervisory activities;
- Responsibility and fairness in the management of corporate resources, preventing improper use for personal purposes or in ways that could harm the Company or third parties.

Litokol's commitment is expressed through the implementation of the following actions:

1. preparing financial statements and corporate communications required by law with clarity and transparency, correctly and truthfully representing the company's financial and equity position;
2. not preventing or otherwise hindering the legally assigned activities of control bodies;
3. In communications to Public Authorities, not providing untrue information regarding the economic, financial, or equity situation, nor concealing relevant information regarding the same.

Any employee who becomes aware of omissions, tampering, falsifications, or negligence in accounting or in the supporting documentation on which accounting records are based is required to report the facts to the competent control bodies.

REPORTING (WHISTLEBLOWING)

In compliance with Legislative Decree 24/2023, Litokol has adopted a whistleblowing system aimed at fostering a culture of transparency and legality.

The system ensures that employees, collaborators, and third parties can, in good faith, report behaviors contrary to the law, the Ethical Code, or Organizational Model 231.

Dedicated platform: Litokol uses the digital platform MyGovernance – Gruppo Zucchetti, appointed as external Data Processor in accordance with the GDPR.

Authorized internal managers: the management of reports is entrusted to designated and trained staff of the Human Resources Department (currently Mr. Smerrieri and Mr. Medici).

Operational flow: reports are notified via e-mail to the Human Resources Department and subsequently managed in a traceable and confidential manner through the platform.

Protection of the whistleblower: confidentiality of the whistleblower's identity is guaranteed, along with an absolute prohibition of retaliation or discrimination, as well as the protection of personal data.

Anonymous/confidential reports: the platform also allows the submission of anonymous reports while maintaining an active communication channel with managers.

Reference to internal procedure: for further details, reference is made to the Company's Whistleblowing Procedure, which governs methods, timelines, and protections.

Role of the Supervisory Body (OdV): the Supervisory Body receives periodic reports on whistleblowing cases, in line with its monitoring duties regarding the implementation of Organizational Model 231.

PERSONAL DATA PROTECTION

In carrying out its activities, Litokol processes personal data, including sensitive data, of its clients, employees, and service users.

We comply with European regulations and other national laws concerning personal data and the privacy of our employees, collaborators, suppliers, and service users.

The Company requires that its employees and the employees of partner companies, in the exercise of their functions, ensure that personal data are processed in compliance with the applicable regulations, the governance structure adopted, and in accordance with the principles of lawfulness, fairness and transparency, purpose and storage limitation, integrity, and confidentiality.

“The Company carefully handles the personal data of its employees and requires them, as well as employees of partner companies, to do the same with third-party data they may become aware of in the course of their duties”

To this end, the processing of personal data is permitted only by authorized personnel, within the limits of their mandate, and in compliance with the applicable laws in each country, as well as Litokol’s internal procedures inspired by such laws.

By way of example, each Manager must:

- ✓ Acquire and process only the data strictly necessary and directly connected to their functions, in compliance with the legal bases and purposes for which they were collected;
- ✓ Store the data in such a way as to prevent unauthorized third parties from gaining knowledge of them, even accidentally or inadvertently;
- ✓ Communicate and disclose the data only within the scope of established procedures or with the prior authorization of the data subjects or the delegated person;
- ✓ Determine the confidential and reserved nature of the information;
- ✓ Ensure that no confidentiality obligations exist by virtue of relationships of any kind with third parties;
- ✓ Handle with absolute confidentiality, even after the termination of their relationship with the Company, any data, information, and knowledge acquired, avoiding their dissemination or use for speculative purposes of their own or of third parties.

The above rules on proper information management are the subject of periodic information initiatives involving personnel.

INTELLECTUAL PROPERTY AND COPYRIGHT

The protection of the Company’s intellectual property—including patents, trade secrets, trademarks, distinctive signs, technical and scientific knowledge, know-how, and expertise acquired in the course of business activities—is essential to preserving the Company’s competitive advantage.

“Each employee must protect Litokol’s information”

Employees are required to define, protect, maintain, and defend the Company’s rights in all areas of intellectual property and commercially relevant matters and to exercise such rights responsibly.

In addition to protecting the Company’s intellectual property rights, the intellectual property rights of others must also be respected.

Many materials and contents used are protected by copyright legislation.

The reproduction, distribution, or modification of copyrighted materials without the consent of the rights holder is illegal and prohibited under this Cod.

Unauthorized duplication of copyrighted materials may result in violations subject to civil and/or criminal penalties.

By way of example, Recipients must comply with the following rules of conduct:

1. Any intellectual and/or industrial property rights relating to software and/or products protected by copyright or by other intellectual and/or industrial property rights must be preserved by the Company;
2. Only authorized and licensed software, acquired through official and reliable sources, must be used;
3. Where licenses establish a maximum number of users, usage limitations, volumes of use, or maximum number of installations, such limits must not be exceeded, and compliance must be periodically monitored to ensure conformity with the relevant license conditions;
4. Employees must adopt appropriate behaviors to preserve and protect the intellectual or industrial property rights (content, software, know-how, patents, logos, videos, images, and trademarks) of the rightful owner. In particular, duplication and publication of these elements are prohibited unless expressly authorized, as is their conversion into formats other than the original where not authorized;
5. Uploading is permitted exclusively for content defined and authorized by the Company.

USE OF COMPANY ASSETS

Each employee is required to act diligently to safeguard company assets through correct and responsible behavior, in line with the operating procedures established to regulate their use, and to document their utilization with accuracy.

By way of example, each employee is prohibited from:

1. Accessing company information through devices other than those assigned by the Company, or accessing data, servers, or any account for purposes other than the conduct of work activities;
2. Disclosing passwords or allowing others (including family members) to use their personal account;
3. Introducing malicious programs (so-called malware) into the network, devices, or servers;
4. Performing network port scanning unless previously authorized by the Security Function;
5. Carrying out any form of network monitoring that intercepts data not intended for the employee's host, unless such activity is part of the employee's normal work/duties;
6. Using any program/script/command or sending messages of any kind with the intent to interfere with or disable a user's terminal session, by any means, locally or via Internet/Intranet/Extranet;
7. Accessing websites whose content is offensive, harassing, vulgar, blasphemous, xenophobic, racist, pornographic, or otherwise inappropriate or illegal, or engaging in hacking activities;
8. Publishing, downloading, or transmitting files containing material of illicit origin or nature, obscene, threatening, or offensive documents, content inciting racial hatred, or that may in any way constitute a violation of laws, regulations, or internal company policies;
9. Using company IT resources for any type of betting or gambling.

Each employee is responsible for the protection, proper storage, and correct use of the assets entrusted to them and has the duty to promptly inform the appropriate functions of any threats or harmful events affecting the Company.

SOCIAL MEDIA E COMMUNICATION

Corporate reputation is a fundamental asset to be safeguarded.

Litokol has adopted specific rules regarding the use of social media and public communications:

- è vietata la diffusione, anche a titolo personale, di contenuti falsi, lesivi o potenzialmente dannosi per l'immagine della Società;

- the dissemination, even on a personal basis, of false, harmful, or potentially damaging content to the Company's image is prohibited;
- online and offline communications must be consistent with the values of the Ethical Code and with the Company's communication policy;
- employees are encouraged to clearly distinguish personal opinions from corporate positions;
- institutional communication is the exclusive responsibility of authorized corporate functions;
- employees must refrain from publishing any image, comment, video, footage, or, more generally, any content on social media or online relating to Litokol's plants, factories, production or R&D facilities, production methods, industrial secrets and know-how in general, activities, machinery, plants, or assets, or any other sensitive information of the Company

Violation of the rules on the use of social media and public communications may be subject to disciplinary measures, and the Company reserves the right to adopt all necessary measures in the event of violations, including the activation of procedures under Article 7 of the Workers' Statute.

6. Implementation Provisions

Effectiveness of this Code with respect to the Recipients

Compliance with this Code forms an integral part of employees' obligations, including pursuant to and for the purposes of Article 2104 of the Italian Civil Code.

Violation of this Code by Recipients may constitute a breach of contract and/or a disciplinary offense and, where applicable, may result in compensation for any damages caused to the Company by such violation, in accordance with current legislation and applicable collective agreements.

Recipients are required to comply with the provisions of this Code both in their relationships with one another (so-called internal relations) and in their relationships with third parties (so-called external relations). In particular:

1. Directors and control bodies, in carrying out their functions, are guided by the principles of this Code;
2. Directors and managers must conduct themselves in accordance with the principles set out in this Code and require compliance from employees and collaborators. To this end, their conduct must serve as an exemplary model of observance and implementation of the Code;
3. For the purposes of this Code, each individual is directly responsible for coordinating and/or supervising the collaborators under their direction and must ensure the prevention of violations of this Code. In particular, each director and/or manager is required to:
 - 3.1. communicate to their collaborators, clearly, precisely, and comprehensively, the obligations to be fulfilled, and specifically the obligation to comply with the law and with this Code;
 - 3.2. communicate unequivocally to their collaborators that, in addition to disapproving any violations of this Code, such violations may constitute a breach of contract and/or a disciplinary offense, in accordance with current legislation, and may therefore be subject to sanctions;
 - 3.3. promptly report to their superior their own observations as well as any information received from their collaborators regarding potential or actual violations of this Code by any employee or collaborator;
 - 3.4. within the scope of their assigned functions, implement or promote the adoption of suitable measures to prevent the continuation of violations and to prevent retaliation against their collaborators or any other employee or collaborator;
4. Employees and collaborators must conduct themselves in accordance with the principles set out in this Code and with the communications of their supervisors.

The Company promotes awareness and application of this Code among Recipients also by including in their respective contracts specific clauses establishing the obligation to comply with the provisions of this Code.

For applicable sanctions in the event of violations of the Code, and for related disciplinary proceedings, reference is made to the provisions of the National Collective Labor Agreement and/or applicable local labor law regulations.

Effectiveness of this Code with Respect to Third Parties

Recipients, in the performance of their duties involving third parties, must:

1. inform third parties, where necessary, of the obligations set forth in this Code;
2. require compliance with the obligations arising from this Code that directly concern their activities;
3. Report to their manager any conduct by third parties that is contrary to this Code or otherwise capable of inducing Recipients to commit violations of the Code itself.

Litokol promotes awareness of the fundamental principles contained in this Code among third parties with whom the Company has relationships, taking into account their legal, social, economic, and cultural context, also by including in their contractual models and agreements with the Company specific clauses establishing the obligation of such third parties to comply, within their own activities and organization, with the provisions of this Code.

Company management verifies the implementation of the above.

To ensure compliance with the principles set out in this Code, Litokol guarantees:

1. the widest possible dissemination and accessibility of this Code;
2. the uniform interpretation and application of this Code;
3. the carrying out of investigations into reports of violations of this Code and the application of sanctions in the event of violations, in accordance with current legislation;
4. the prevention and prohibition of any form of retaliation against those who contribute to the implementation of this Code;
5. the periodic updating of this Code, based on emerging needs and in light of the activities mentioned above.

Without prejudice to the powers conferred by law on the Company's governing bodies, all employees are required to implement and contribute to the implementation of this Code, within the limits of their competencies and functions.

The revision of the Code is approved by the Sole Director.

The proposal is formulated taking into account stakeholder evaluations regarding the principles and contents of the Code, also encouraging their active contribution and the reporting of any shortcomings.

“Each of us is called to safeguard the integrity of Litokol's reputation and to act correctly so as not to jeopardize our future success”

All employees and collaborators of the Company are required to cooperate, including by providing the corporate documentation necessary for the performance of relevant activities.

In case of doubt regarding the legality of a particular behavior, its ethical implications, or its compliance with the Code, the Recipient may contact their immediate superior and/or manager.

This Ethical Code is available on the Company's website, and Litokol undertakes to promote its knowledge, dissemination, and compliance among all Recipients.

Anyone who suspects violations of laws, internal regulations, or this Ethical Code must promptly report them without fear of retaliation and with an absolute guarantee of anonymity through the Whistleblowing service.

Reports may also be made directly to managers, to Company management, or through institutional corporate channels. Confidential reporting channels are also provided (MyGovernance Whistleblowing Portal, <https://areariservata.mygovernance.it/#!/WB/Litokol>), in accordance with Legislative Decree No. 24/2023.

This Ethical Code must be considered as an integration of the contract signed with Litokol.

For Litokol employees, any failure to comply with the principles and provisions set out herein constitutes a breach of work obligations, with possible disciplinary measures in accordance with current legislation.

For all other Recipients, violation is equivalent to a contractual breach, handled in accordance with applicable law, and may justify the termination of existing contracts.