

CODE OF CONDUCT

Cistelaier S.p.A.

Scope

To ensure clarity and transparency across the organization, this Code of Conduct is issued in English and, where applicable, may be translated into other languages. In case of discrepancies, the English version shall prevail.

This Code of Conduct should be read in conjunction with the Company's Code of Ethics and relevant internal policies, which all employees are required to follow.

The Code defines the principles and standards of behavior expected from all employees and collaborators. Each individual is responsible for acting in compliance with these principles and for contributing to a work environment based on integrity, respect, and accountability.

The Company does not tolerate any form of misconduct or behavior that violates applicable laws, internal policies, or the principles outlined in this Code.



Introduction

Cistelaier considers sustainability a key driver for long-term growth and business development.

The Company believes that respect for people and sustainable development are fundamental principles guiding its activities.

Employees play a central role in ensuring quality, reliability, and continuous improvement across all processes.

The Company promotes a culture based on integrity, responsibility, and collaboration, aiming to create lasting value for customers, partners, and stakeholders.

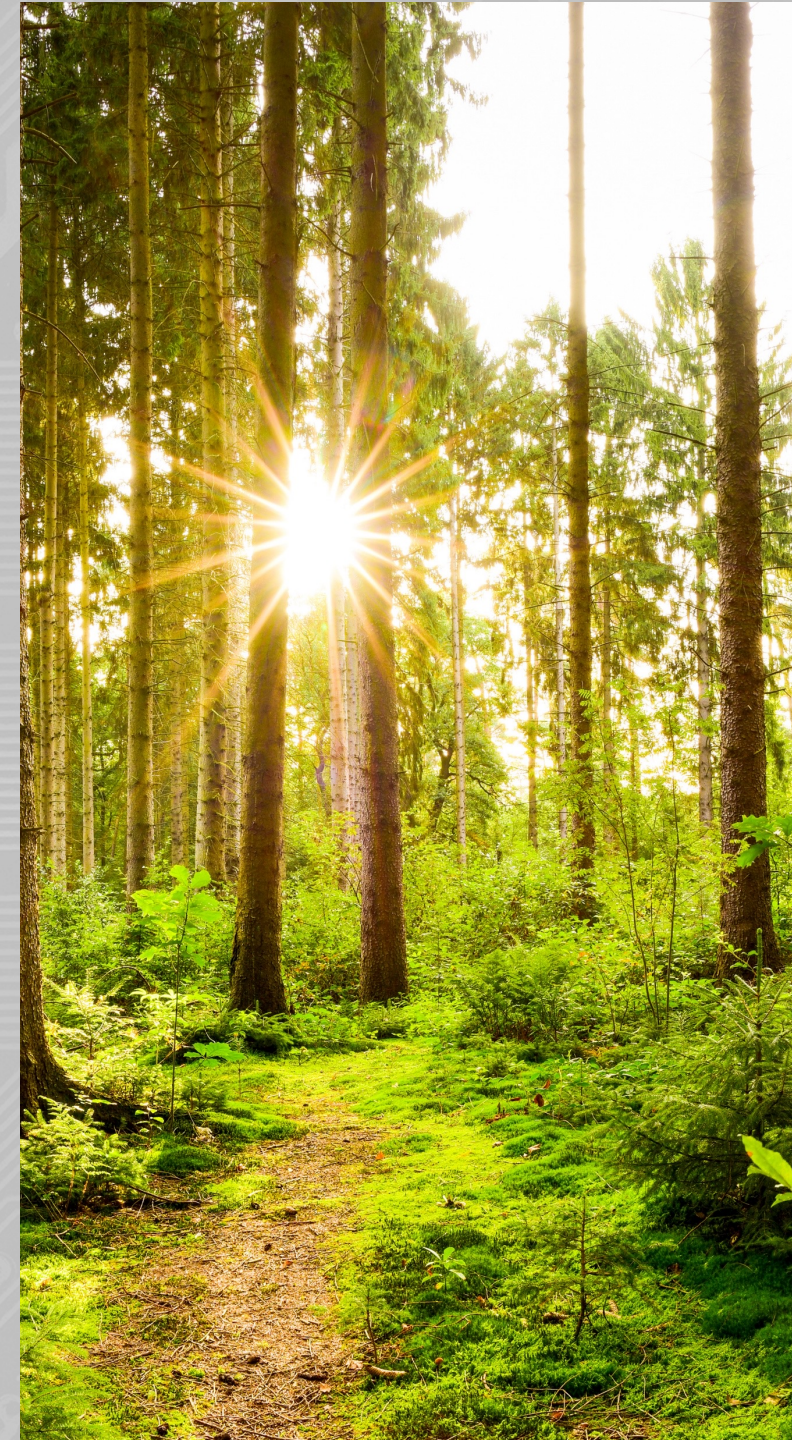
Human right and Workplace Practice

Human Rights & Workplace Practices

- The Company is committed to respecting fundamental human rights and promoting a fair and inclusive workplace.
- All employees must be treated with dignity and respect, regardless of role, background, or personal characteristics.
- Any form of discrimination, harassment, abuse, or unfair treatment is strictly prohibited.
- The Company does not tolerate forced labor, modern slavery, or human trafficking in any form.
- Child labor is strictly prohibited under all circumstances.
- The Company ensures fair working conditions, including appropriate compensation, safe working environments, and reasonable working hours.

Environment & Sustainability

- The Company is committed to minimizing environmental impact and promoting sustainable practices across all operations.
- Compliance with all applicable environmental laws and regulations is ensured, including requirements related to restricted substances (e.g. REACH, RoHS).
- Resources are used efficiently, with a focus on reducing waste and optimizing consumption.
- Waste management is carried out in accordance with applicable regulations, aiming to minimize environmental impact.
- Production processes are designed to reduce resource consumption and support environmental protection.





Business Ethics & Fair Practices

- The Company conducts its business with integrity, transparency, and professionalism.
- All activities must comply with applicable laws, including antitrust, anti-corruption, and fair competition regulations.
- Any form of bribery, corruption, or improper advantage is strictly prohibited.
- Conflicts of interest must be avoided and, where identified, promptly disclosed.
- Compliance with applicable export control and international trade regulations is ensured.
- Company information, assets, and intellectual property must be properly protected and used only for legitimate business purposes.

Reporting Concerns (Whistleblowing)

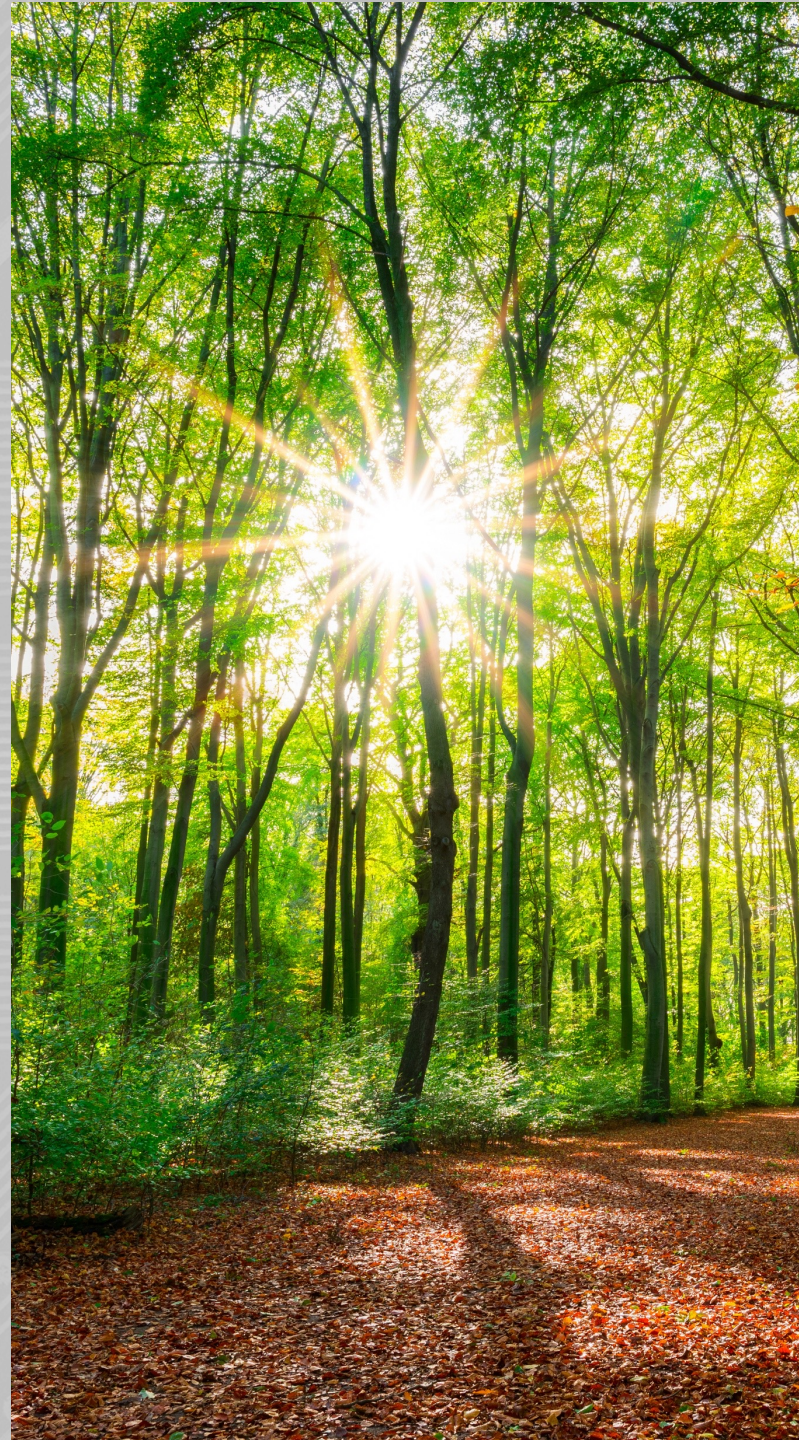
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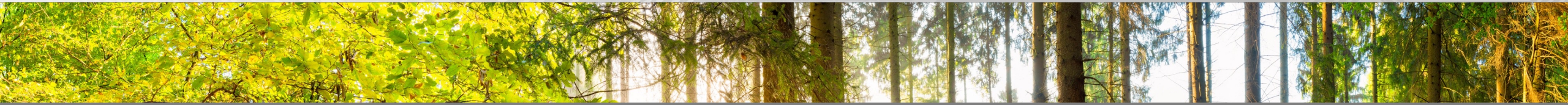
- Employees are encouraged to report any misconduct, irregularities, or violations of this Code.
- The Company ensures that all reports are handled confidentially and in accordance with applicable regulations.
- Any form of retaliation against individuals who report concerns in good faith is strictly prohibited.
- A dedicated whistleblowing system is available to submit reports, including anonymously where permitted by law.
- For questions or concerns, employees may also contact their manager or the relevant internal function.

Audits, inspection & traceability

Audits, Inspections & Traceability

- The Company promotes transparency and traceability across all operational and production processes.
- Internal and external audits may be conducted to ensure compliance with quality, environmental, and regulatory requirements.
- The Company supports customer audits and inspections, providing access to relevant processes and information where applicable.
- Employees are expected to cooperate during audits and inspections and ensure the accuracy and completeness of information provided.





Violations of the Code

- The Company promotes a culture of continuous improvement and supports employees in identifying and addressing potential issues.
- Any violation of this Code, internal policies, or applicable regulations may result in disciplinary actions, in accordance with Company rules and applicable laws.
- Where necessary, corrective actions may be defined and implemented within agreed timelines.
- Serious or repeated violations may lead to further actions, up to and including termination of employment.
- This Code of Conduct may be updated over time to reflect regulatory, organizational, or operational changes.