

INDEX

LIST OF REVISIONS / APPROVALS 1

WHY DO WE NEED A CODE OF CONDUCT? 2

WHO ARE THE RECIPIENTS OF THE CODE? 2

WHAT ARE MY RESPONSIBILITIES? 2

WHAT ARE THE BASIC PRINCIPLES OF THE PATH OF INTEGRITY? 3

WHAT RELATIONSHIP EXISTS BETWEEN THE CODE OF CONDUCT AND CURRENT REGULATIONS? 3

WHAT BEHAVIOURS CAN BE SUBJECT TO DISCIPLINARY SANCTIONS? 4

HOW SHOULD I EVALUATE MY BEHAVIOUR AND THAT OF OTHERS? 4

WHISTLEBLOWING POLICY WHAT HAPPENS WHEN A VIOLATION OF THE CODE IS REPORTED? 4

WHERE CAN I FIND ADDITIONAL INFORMATION AND SUPPORT? 5

LIST OF REVISIONS / APPROVALS

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0	17.01.18	First issue	L. Platini	E. Riva
01	27/09/2022	Layout update	L. Platini	F. Landi
02	01.02.2024	Whistleblowing Policy update	L. Platini	F. Landi

WHY DO WE NEED A CODE OF CONDUCT?

The communities in which we operate are influenced by our conduct as employees and collaborators of OFFICINE RIVA S.P.A., and benefit from it when we act properly. However, it is not always easy to understand what the best choice is and how to act properly: this is why we need guidelines.

At OFFICINE RIVA S.P.A., the Code of Conduct (**The Code**) represents the way to develop a work environment that incorporates high ethical standards of conduct. Our values inspired by honesty are the basis of corporate governance and include a fundamental system of Principles, Standards and Procedures that combines our corporate experience with legal requirements, research into best practices and discussion on ethics and compliance issues.

The purpose of the Code is ensuring that all members of OFFICINE RIVA S.P.A. act with the utmost integrity, complying with the laws in force, building a better future for our Company and the communities in which we operate. OFFICINE RIVA S.P.A. shares, and its Code of Conduct implements, the principles of the “Universal Declaration of Human Rights” of the United Nations (“UN”), the Conventions of the International Labour Organisation (“ILO”) and the Guidelines of the Organisation for Economic Co-operation and Development (“OECD”) for multinational enterprises.

The Code applies to **OFFICINE RIVA S.P.A** VAT number 00673550133 and globally to all its employees and collaborators.

No document can reasonably consider all the cases that may arise in carrying out its work. The Code, therefore, guides correct behaviour by reporting cases in which additional assistance is necessary.

Neither the Code nor any Principle, Rule or Procedure is intended to constitute or constitute a contractual right that can be used against OFFICINE RIVA S.P.A. by any employee and collaborator, shareholder, customer and supplier. The guidance in the Code helps us understand what is expected of us and ensures that we are acting with awareness and integrity.

WHO ARE THE RECIPIENTS OF THE CODE?

The Code applies to all stakeholders, both internal and external to OFFICINE RIVA S.P.A. The Code also applies to all temporary collaborators and other people and companies acting in the name and on behalf of OFFICINE RIVA S.P.A. everywhere in the world. All the subjects indicated above collectively constitute our “workforce”.

OFFICINE RIVA S.P.A. undertakes to ensure that even in any companies in which it holds a minority stake, codes of conduct are adopted whose principles are inspired by those of this Code, or in any case are not in conflict with them. OFFICINE RIVA S.P.A. strives to ensure that the Code is considered a “best practice” and is also respected by those with whom it has long-term business relationships, such as: suppliers, customers, consultants and agents.

WHAT ARE MY RESPONSIBILITIES?

Whenever you work on behalf of OFFICINE RIVA S.P.A., or interact with other subjects, you must comply with the Code. Within the limits of local legislation, all members of the workforce of OFFICINE RIVA S.P.A. must be aware that with their behaviour they represent OFFICINE RIVA S.P.A., even outside working hours, if they act or can be understood to act as representatives of OFFICINE RIVA S.P.A. Your conduct reflects on the Company’s external reputation and its internal culture.

We want to create an environment that promotes values and encourages ethical conduct, in order to create a collaborative working environment in which the dignity of each individual is respected. We expect you to comply with every part of the Code and all applicable laws and regulations. All members of OFFICINE RIVA S.P.A. they must treat others as they expect to be treated, including customers and other external parties who have business relationships with the Company.

We not only expect you to know and comply with the Code, but we strongly encourage you to promptly report conduct that does not conform to the letter and spirit of the Code, regardless of whether the conduct in question breaks the law. We also expect you to take a quick and strong stand to address violations of our Code, ask questions, and seek assistance. If you feel that your concerns are not being adequately considered or are not

being addressed to in a timely manner, you should continue to raise the issue and, where necessary, use one of the other channels available to report the issue.

All members and suppliers of OFFICINE RIVA S.P.A. are responsible for company assets and resources, in compliance with the Principles, Rules and Procedures in force. All members and suppliers of OFFICINE RIVA S.P.A. are required to comply with these provisions, providing precise, timely and concrete information. We expect you to be totally helpful and honest in such situations.

You may be asked to certify your understanding of and adherence to the Code, or to any specific Principles, Rules or Procedures. In this case, this certification is mandatory.

WHAT ARE THE BASIC PRINCIPLES OF THE PATH OF INTEGRITY?

OFFICINE RIVA S.P.A.'s integrity system consists of three elements:

Principles

The Principles are general statements that express the commitment of OFFICINE RIVA S.P.A. to ensure compliance with correct corporate and personal conduct.

Standards

The Standards establish guidelines for conduct that complies with our Principles. They serve as a guideline, they are a tool for navigating complex situations and obtaining the desired results; they are the basic rules that must guide our daily actions. These Rules are an integral part of the Code.

Procedures/Codes

When more information is needed, the Procedures explain in detail how to act in compliance with the Regulations. The scope of application of some Procedures may be limited to certain geographical areas and/or business sectors, as the case may be.

The nature of some objectives of OFFICINE RIVA S.P.A. may make it necessary to apply more specific rules of conduct than those provided for in this Code. In these cases, additional rules may be established for certain geographic areas, business sectors, or individual activities in the form of Specific Procedures or other rules. The Code requires you to also follow these rules applicable to your geographic area, business sector or individual activity. In any case, all members of OFFICINE RIVA S.P.A. must comply with the provisions contained in the Code.

To facilitate compliance with the Code, OFFICINE RIVA S.P.A. implements various periodic training initiatives to ensure that employees are adequately informed about the provisions contained in the Code.

WHAT RELATIONSHIP EXISTS BETWEEN THE CODE OF CONDUCT AND CURRENT REGULATIONS?

One of the fundamental elements of the Code is compliance with current regulations in the conduct of OFFICINE RIVA S.P.A.'s business. The current regulatory framework reflects the behavioural expectations of the communities in which we operate. Furthermore, if laws are broken there is a negative financial and/or image impact on our Company. Failure to comply with the laws can also lead to serious consequences, including criminal consequences, for the individuals involved. For these reasons, our Principles, our Policies (where applicable) and our Procedures/Codes place a strong emphasis on compliance with the laws that govern our business activity. The Code represents an essential component of the ethics and compliance programme of OFFICINE RIVA S.P.A., aimed at ensuring effective prevention and detection of violations of laws and regulations applicable to its activities.

If our activities are subject to the laws of different countries, each of us has an imperative duty to comply with the laws of the geographic area in which we operate. If the Code and local legislation do not conflict, you are required to comply with both. In the event that the laws and regulations in force in a particular jurisdiction are more permissive than those contained in this Code, the latter will prevail.

If you have any doubts about your duties, or if you think you cannot comply with local legislation without violating the Code, or vice versa, you should immediately clarify your doubts by contacting one of the people listed in the **WhistleBlowing Policy**.

WHAT BEHAVIOURS CAN BE SUBJECT TO DISCIPLINARY SANCTIONS?

We expect the best from our employees and collaborators, especially in terms of taking on responsibilities. Those who violate the Code and current legislation, or who behave in a manner contrary to the spirit of the Code, are subject to consequences which may include the possible termination of the employment relationship, as well as the initiation of legal proceedings. Any violation of the Code will be assessed objectively and fairly by the competent bodies who will apply the appropriate disciplinary sanctions.

By way of example, but not limited to, conduct subject to disciplinary sanctions are:

- Violate the law or the Code either directly or indirectly
- Be complicit in a violation of the law or the Code
- Provide false and/or misleading information to the Company, or intentionally withhold material information at any time, including during an investigation
- Not adequately supervising the conduct of our People
- Do not take action regarding known or suspected violations of the law or the Code
- Deliberately ignoring information that falls within your area of responsibility and that would allow you to become aware of known or suspected violations of the law or the Code
- Do not cooperate or hinder the checks of Internal Audit, Human Resources, Legal or other bodies involved in investigations regarding illegal or ethically incorrect conduct
- Retaliate against anyone who reports illegal or unethical conduct
- Intentionally making false accusations of illegal or unethical conduct

HOW SHOULD I EVALUATE MY BEHAVIOUR AND THAT OF OTHERS?

Given the pace and complexity of the work context, you may encounter situations that seem ethically incorrect. Knowledge of the Code is essential to guide your actions when faced with such situations.

While the Code contains an overview of relevant conduct and examples, you may find yourself in a particular situation where you feel the guidance provided by the Code is not sufficiently clear or applicable. To help you determine what actions are necessary, you need to ask yourself the following questions:

- Is this activity legal?
- What are the potential consequences of my actions?
- Does the activity or conduct comply with the letter or spirit of the Code?
- Does this activity make me feel uncomfortable?
- Could this activity give the impression of being improper?
- How would I feel if I did absolutely nothing?
- Is my Supervisor aware of and approves of this activity?

Violations of ethics are sometimes less obvious than we might expect, and it may not be clear how to comply with the Code in a particular or unusual situation. Sometimes, even if the Code is clear, it contains provisions that are in contrast with the culture of the geographical area in which we operate. For specific guidance on how to enforce the Code, you can contact one of the individuals listed in the **Whistleblowing Policy**

WHISTLEBLOWING POLICY WHAT HAPPENS WHEN A VIOLATION OF THE CODE IS REPORTED?

Investigations will be carried out on reports regarding illegal or ethically incorrect conduct in compliance with Law 30 November 2017, no. 179: Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship, published in the Official Gazette no. 291 of 14 December 2017.

As part of OFFICINE RIVA S.P.A., we are committed to conducting due diligence investigations into all alleged violations reported. Information regarding reports of incorrect behaviour will be evaluated by our Management. Any report will be the subject of investigations which will be conducted, as appropriate, by qualified personnel or experts in the subjects in question. If incorrect behaviour is detected, appropriate corrective actions will be defined regardless of the level or position of the person(s) involved. All cases will be managed until a final solution is reached.

Confidentiality is fundamental

Unless prohibited by local law, reports or complaints may be made anonymously; however, it is useful to communicate your name and the data necessary to be able to be contacted in order to provide further details and information. All information provided and the identity of the person who made the report will be shared only with those responsible for checks and investigations and who will have to take corrective actions.

Remember that you are strongly encouraged, in accordance with the Code, to report alleged illegal or unethical behaviour, even if you choose to remain anonymous.

Retaliation will not be tolerated

We are seriously committed to applying the Code. Retaliation against anyone who, in good faith, raises a concern regarding a possible violation of the Code will not be tolerated. The Code expressly prohibits members of our Company from being retaliated against or receiving discriminatory treatment for reporting or participating in an investigation. Anyone who retaliates against such individuals will be subject to disciplinary proceedings which could even result in dismissal. No one can be demoted, fired, suspended, threatened, harassed, subjected to intimidation following a report, in good faith, of ethically incorrect behaviour or participation in an investigation relating to the application of the Code.

If you believe you or someone you know is a potential victim of retaliation for reporting a violation or participating in an investigation, please make your voice heard. We need your participation to ensure that there is no retaliation in our Company.

WHERE CAN I FIND ADDITIONAL INFORMATION AND SUPPORT?

Further detailed information can be found in the Company procedures/codes (Code of Ethics, Anti-Corruption Code, ...) which are to be considered an integral part of this Code.

In the event that you witness or become aware of conduct contrary to the spirit of the Code, it is essential that you take charge of the matter by informing those responsible with one of the defined communications channels in the **WHISTLEBLOWING POLICY** available on the site www.officineriva.it