DATE	DESCRIPTION OF CHANGES		
22/10/2026	Adaptation to SAQ 5.0 questionnaire requests		
PREPARED	PIERO BRUSCHI	APPROVED	SILVANA MARTINELLI

1. Introduction and Objectives.

This document, called the "Code of Ethics", identifies the moral rights and duties, defining the ethical and moral responsibility of each participant in the Company. In this sense, the "Code of Ethics" regulates the set of rights, duties and responsibilities that **F.LLI MARTINELLI** expressly assumes towards its "stakeholders" (interested parties) with whom it interacts during the performance of its institutional activities.

The adoption of the "Code of Ethics" by **F.LLI MARTINELLI** aims to ensure fair and effective management of the Company's transactions and human relations to and from its interlocutors, so as to support the Company's reputation and create trust with the outside world. The "Code of Ethics" therefore assumes the essential role in preventing irresponsible or unlawful conduct by those who work in the name and on behalf of the Company, as it introduces a clear and explicit definition of the ethical and social responsibilities of its managers, middle managers, employees and suppliers towards the various interlocutors with whom it interacts.

2. General ethical principles and standards.

The "Code of Ethics" is the main tool for implementing ethics within the Company, aimed at clarifying and defining the set of principles to which employees are called to conform in their mutual relations as well as in their relations with external collaborators. Everyone is called upon to respect the values and principles expressed in the document and is required to protect and preserve, through their own conduct, the respectability and image of **F.LLI MARTINELLI** as well as the integrity of its economic and human assets.

The recipients of the "Code of Ethics" are therefore all those who work in the Company and all those who, directly or indirectly, permanently or temporarily, establish relationships or relationships with **F.LLI MARTINELLI,** to support, promote and pursue its objectives.

Each company representative is obliged to comply with this "Code of Ethics": the Company considers this aspect fundamental to concretely pursue a responsible and ethical business model: each of them, therefore, has the obligation to know the rules, refrain from conduct contrary to them, contact the superior for clarifications or complaints, collaborate with the structures responsible for verifying violations and not hiding their existence from third parties. In business relationships, the counterparties must be informed of the existence of rules of conduct and must comply with them. Violation of the rules of this "Code of Ethics" may cause the relationship of trust between **F.LLI MARTINELLI** and the company representative who committed it to be broken. Compliance with the rules of the Company "Code of Ethics" is to be considered an essential part of the contractual obligations of all employees pursuant to art. 2104 of the Civil Code.

3. Compliance with rules and regulations.

Violations of the law determine, by the competent Judicial Authority, the imposition of sanctions related to the specific violation committed in the specific case and may also result in the interdiction, on the part of **F.LLI MARTINELLI**, of the exercise of its own activities, both in the private and in the public sector and expose **F.LLI MARTINELLI** to claims for compensation for damages related to the same violation of the law, with obvious negative repercussions not only at an economic level but also at the level of image and reliability in the national and international market of operation.

F.LLI MARTINELLI has formally adopted this "Code of Ethics" to clearly define the set of values that it recognizes, accepts, shares and considers fundamental to ensure the proper functioning, reliability and reputation of the Company.

F.LLI MARTINELLI monitors compliance with the "Code of Ethics" with adequate information, prevention and control tools, ensuring the transparency of the operations and conduct carried out, intervening, if necessary, with corrective actions.

The "Code of Ethics" is an integral part of the Management System adopted.

F.LLI MARTINELLI will not continue any relationship with those who do not intend to align themselves with the principle of legality, a fundamental value in full respect of which the Company operates.

4. Ethical conduct.

Ethical conduct means respecting the rules and provisions of the law. **F.LLI MARTINELLI** is committed to enhancing the professionalism of all the people whose skills it uses to pursue the goal of maximum customer satisfaction through the guarantee of reliability over time of the products and services provided, in strict compliance with all regulations, also and above all in terms of the environment, safety and health in the workplace. **F.LLI MARTINELLI** makes every effort and commitment to ensure that its managers, employees and collaborators behave in an ethically correct manner in the execution and performance of all commercial and corporate activities within their competence and entrusted to them. **Ethical conduct** also means identifying and respecting the spirit of internal needs, avoiding any attempt to circumvent them.

GENERAL ETHICAL PRINCIPLES

VALUE OF THE PERSON: THE VALUE OF THE PERSON REPRESENTS A FUNDAMENTAL PRINCIPLE AT THE CENTER OF THE DAILY ACTIONS OF **F.LLI MARTINELLI**, which is committed to using listening and dialogue as tools for continuous improvement both with respect to the proposals for solutions to customers and with respect to the enhancement of the personality and competence of its employees and collaborators.

HUMAN RIGHTS: The primary value pursued by the Company is full respect for human rights, the implementation of which is promoted within its sphere of influence. **F.LLI MARTINELLI** undertakes not to implement, even indirectly, any abuse or violation of human rights (also understood as racism, xenophobia, slavery, harassment and discrimination).

5. The Recipients of the Code of Ethics.

The recipients of this code of ethics are:

- All the subjects who work within **F.LLI MARTINELLI** for the achievement of the company's objectives.
- All collaborators, external consultants and business partners (including suppliers) are required to comply with this "Code of Ethics" in the conduct of business and commercial negotiations.

6. Employment Relations.

F.LLI MARTINELLI carries out its activities in compliance with the laws and regulations in force in the countries in which it operates. Compliance with this principle is a constant duty of all those who have relations with the Company and characterizes the conduct of the entire organization. The directors and employees of **F.LLI MARTINELLI** as well as those who work with it in various capacities, are therefore required, within the scope of their respective competences, to know and comply with the laws and regulations in force in all the countries in which it operates.
This context also includes attention to and compliance with the regulations governing competition, both on the national market and internationally.

7. Fair competition.

F.LLI MARTINELLI is committed to ensuring fair competition, believing that fair competition is a fundamental element for the common well-being. The Company refuses to be a party to any illegitimate, illicit or inadmissible agreement or to agreements that restrict or disturb trade (for example, counterfeiting, the exchange of information relevant to competition, the use of supplies from suppliers on black-lists or subject to embargoes, with particular reference to the https://sanctionsmap.eu/ website).

8. Corruption.

F.LLI MARTINELLI does not tolerate corruption. Influencing the decisions that can be taken by public or private entities, promising or granting benefits and utilities of any kind, is prohibited by law and is criminally sanctioned. **F.LLI MARTINELLI** is committed to fighting corruption and preventing any behavior that may even provide the slightest impression of corrupt action, and in this perspective guarantees transparency in all activities and practices. Each operation and transaction is correctly recorded, authorized, verified and verifiable, legitimate, consistent and congruous, according to the regulations in force and according to internal procedures.
F.LLI MARTINELLI acts decisively wherever there is a suspicion of collusion or corruption, adopting all the most appropriate measures.
Gifts, gifts and other benefits, even if only promised, to customers, suppliers, administrators, collaborators, employees, public officials or persons in charge of public service are allowed only when they are adequately authorized and documented, of modest value and in any case such that they cannot be interpreted by third parties as aimed at acquiring any type of advantage in an improper or illicit way. In any case, gifts, tributes and other benefits must never in any way be intended or aimed at influencing or rewarding an act of the recipient's office.
Each manager, employee or collaborator of **F.LLI MARTINELLI** must refrain from accepting gifts or tributes exceeding the normal practices of courtesy, as well as from accepting, for himself or for others, any other benefit or utility, even if only in the form of a promise, aimed at compromising his independence of judgment, impartiality and operational correctness. The manager, the employee, the collaborator who, by reason of the exercise of the activity carried out for **F.LLI MARTINELLI,** receives, even at his home, gifts or other forms of benefit or utility, in contrast with the above, must take all appropriate initiatives in order to refuse said gift, benefit or utility and inform the hierarchical superior or contact person for the appropriate evaluations and actions. Employees are not authorized to accept any discounts, special rates or other privileges that may be granted due to their relationship with **F.LLI MARTINELLI**, if such privileges are likely to influence their professional decisions.

9. Money laundering and blacklisting management

F.LLI MARTINELLI is committed to the fight against money laundering and has adopted the necessary precautionary measures. These measures are also aimed at adequately raising awareness among **F.LLI MARTINELLI's** employees and collaborators so that, in the exercise of their respective duties and functions and in business relations, they act in full compliance with national and supranational legislation aimed at combating money laundering.

F.LLI MARTINELLI verifies the absence of its suppliers/customers in the black lists of the European Community on the https://sanctionsmap.eu/ website.

10. Fair employment and social interaction.

F.LLI MARTINELLI fights all forms of illegal employment and exploitation of workers. Illegal employment weakens the labour market and the social security system. It jeopardizes employment and prevents the creation of new jobs, negatively affecting the national economy. The violation of workers' rights, recognised by the Statute and by national and supranational legislation, cannot in any way be reconciled with the ethical values of the Company which are based on full and absolute respect for these fundamental rights, including suitable working hours, fair and equitable remuneration, wages and benefits, freedom of trade union association.

F.LLI MARTINELLI is committed to hiring people, pursuing gender equality in the selection and hiring phase through the identification of a shortlist of candidates who tend to be equal for men and women.

At the same time, the Company is committed to emphasizing the importance of meritocracy.

F.LLI MARTINELLI's **remuneration policy** is based on the principles of recognition of the responsibilities assigned, the results achieved and the quality of the professional contribution made.

F.LLI MARTINELLI observes the principles of respect in mutual relations. All employees have equal opportunities when they are hired and in the further growth of their career within the Company.

Discrimination in any form is prohibited, whether based on gender, age, race, religion, political and trade union membership, language, ethnicity, sexual orientation or health status. In particular, no one may be harassed or disadvantaged because of their nationality, gender, sexual orientation,

religious or ethical beliefs, disability or age. **F.LLI MARTINELLI** expects all its employees to contribute to a productive work environment by treating each other with mutual respect, tolerance and consideration. Employees are encouraged to report all events in a hostile work environment and must do so without fear of retaliation by the Company.

Any conduct of violence and harassment at work is not tolerated as it is in contrast with the values and commitment of **F.LLI** MARTINELLI.

Last but not least, priority is given to the employment of personnel from neighboring areas, favoring the employment of the local minority (meaning the indigenous population of the Pistoia mountains).

11. Employees and Collaborators.

Staff are hired with a regular employment contract; any form of irregular work is not tolerated. When the employment relationship is established, each employee receives all the information relating to the characteristics of the function and the tasks to be performed, the regulatory and remuneration elements, as regulated by the national collective labour agreement and the rules and procedures to be adopted for their work. This includes compliance with labour regulations, which prohibit, for example, the use of mobbing practices and the use of staff without a residence permit or the use of child labour.

The employee must, however, comply with the restrictions on the use and disclosure of information (official secrecy) owned by the Company.

It is forbidden to use artificial intelligence systems to disseminate falsified or altered images, videos or voices capable of misleading people.

The Company protects the moral integrity of employees and guarantees working conditions that respect the dignity of the person, safeguards workers from acts of psychological violence, and counteracts any discriminatory attitude or behavior or behavior that is harmful to the person and his or her beliefs. Sexual harassment is not allowed and behaviors or speeches that may upset the person's sensibilities must be avoided.

Everyone is guaranteed the same opportunities to express their professional potential. The remuneration to be paid must be commensurate with the service indicated in the contract and payments cannot be made to a person other than the counterparty.

An employee or collaborator who believes that he or she has been harassed or discriminated against for reasons related to age, sex, sexuality, race, health, nationality, political opinions and religious beliefs, etc., may report the incident according to the instructions set out in the paragraph "Handling of wrongdoing reporting" reported later in this document.

12. Workplaces and the Protection of Health and Safety.

F.LLI MARTINELLI is committed to safety in the workplace and strives for the continuous improvement of the efficiency of company structures and processes that contribute to the continuity of the services provided.

The Company guarantees compliance with the provisions of the laws in force on health and safety in the workplace.

The Company undertakes to comply with the legal requirements on safety in the workplace through a correct analysis of Company risks, also asking all employees and non-employees who may have an influence on safety, to comply with the provisions of the internal rules on safety in the workplace (Risk Assessment Document and Internal Procedures) and promptly report any type of anomaly.

13. Respect for human rights.

F.LLI MARTINELLI is committed to ensuring respect for human rights in its activities, operating within the framework of the United Nations Universal Declaration of Human Rights, and between suppliers and business partners, contributing to the creation of a responsible supply chain. **F.LLI MARTINELLI** promotes policies aimed at the psychophysical well-being of staff.

14. Relations with the Public Administration.

F.LLI MARTINELLI aims to achieve the utmost integrity and fairness in relations with public institutions, understood as any public body, or any independent administrative agency, person, natural or legal, acting as a public official or person in charge of a public service. Relations with public institutions are maintained by internal staff of the Company who for no reason may have reasons for conflicts of interest in relations with the interlocutor. In the event of possible conflicts, the recipients of this code are required to behave as required by the same.

F.LLI MARTINELLI will never be represented in relations with public institutions by third parties, whether they are their consultants, suppliers or any collaborator for whom there are conflicts of interest or reasons of strong personal interest.

Relations with the Public Administration must always be managed with professionalism and clarity.

F.LLI MARTINELLI expressly prohibits offering or promising money, gifts or compensation, in any form, nor exercising illicit pressure, nor promising any object, service, performance or favor to managers, officials or employees of the Public Administration, or public institutions or persons in charge of public service, including their relatives or cohabitants, in order to induce the performance of an act of office or contrary to official duties in order to obtain any direct or indirect advantage for the Company.

15. Customers.

Customers are the most important resource of **F.LLI MARTINELLI** which has as its first objective to satisfy, as far as possible, their requests, with a view to a continuous increase in the quality of products and services.

In this context, it is strongly emphasized that the Company's activity is always based on the utmost fairness, transparency and collaboration, in full compliance with the laws, regulations and their institutional functions. Illegal sums of money and bribes are absolutely prohibited from, and under any circumstances. It is never permitted to receive or give money or personal gifts, regardless of the amount, which are an explicit or implicit condition for obtaining any preferential treatment. More generally, no **F.LLI MARTINELLI employee or manager** may take or give illegal sums of money or bribes from or to contractors, subcontractors, consultants, vendors, suppliers, competitors or customers. Gifts and promotional items may be given to customers if they do not exceed normal courtesy relationships and in any case must be of modest value, always in compliance with the law.

16. Suppliers.

F.LLI MARTINELLI makes use of competent suppliers, for whom a specific code of ethics has been prepared, loyal and able to "team up" with internal employees in a relationship of indispensable and reciprocal loyalty, transparency and collaboration. In the event that the supplier does not carry out its activities according to the principles of this code, the Company will take the measures it deems appropriate, up to precluding any other opportunities for collaboration. Relations with suppliers are subject to constant monitoring by the administrative and quality manager. The stipulation of a contract with a supplier must always be based on relationships of extreme clarity and confidentiality. The behaviour of anyone who tries to appropriate the benefits of the collaboration of others, exploiting positions of strength, is unethical.

17. Supply chain.

In the context of relations with suppliers, **F.LLI MARTINELLI** requires compliance with the principles of the Company Policy and this "Code of Ethics" by the various suppliers at various levels of the supply chain.

18. Creating shared value.

F.LLI MARTINELI is committed to reconciling economic objectives with social and environmental ones, generating value for the Company, for stakeholders and for the territories in which it operates, enhancing positive externalities and avoiding or minimizing negative ones.

19. Protection and efficient use of resources and protection of the environment.

F promotes the efficient use of energy resources and the reduction of greenhouse gas emissions, through, where possible, the implementation of energy-efficient technologies and the promotion of renewable sources. In order to minimise the impact of its activities on the environment, the Company encourages the adoption of actions aimed at reducing water consumption, waste and preventing soil pollution.

F.LLI MARTINELLI respects the rights of ownership and possession of the land of the local communities. Any real estate operation, expansion or development of infrastructures takes place in compliance with the legal titles and after transparent consultation of the interested parties.

F.LLI MARTINELLI manages the withdrawal and consumption of water responsibly, ensuring that our activities do not compromise the supply or quality of the resource for local communities.

F.LLI MARTINELLI is committed to preventing deforestation and environmental degradation, operating exclusively on authorized land and respecting the regulations for the protection of the forest heritage, biodiversity and ecosystem with particular reference to the Pistoia mountains such as to promote the preservation of the fauna and flora of the territory.

F.LLI MARTINELLI encourages its suppliers to improve their environmental performance and, where possible, we direct and support them in their improvement process.

20. Sensitive data and information protection.

F.LLI MARTINELLI collects and processes the personal data, sensitive and non-sensitive, of its employees and of the natural and/or legal persons with whom it has relationships or relationships. This processing, where required, is carried out with the consent of the data subjects and takes place in the manner and within the limits provided for by European Regulation no. 2016/679 (GDPR).

These standards also provide for the prohibition, except in the cases provided for by law, of communicating/disseminating personal data without the prior consent of the data subject and establish the rules for the control, by each collaborator, of the rules to protect privacy.

F.LLI MARTINELLI **employees** have access to various information relating to other entities and companies. Access, use and disclosure of such information without authorization could harm the Company or the third party. Employees are therefore prohibited from accessing, using or disclosing such information without due management authorization and in full compliance with the requirements provided by the third party, when the owner of such information.

21. Conflict of interest.

A conflict of interest is generally any activity that is or appears to be in contrast with the best business interests of **F.LLI MARTINELLI.** Any conflict, even if only apparent, must be immediately communicated to the Management.

Employees may not directly or indirectly work or provide advice to a competitor or engage in activities that compete with the Company's economic interests, including working for a supplier. They may not use **F.LLI MARTINELLI**'s customer lists or contacts to market their own or third parties' goods and services, even if they do not compete with the products or services promoted by the Company.

Employees must avoid any material financial interest in a Company in which such interest may conflict with the corporate interests of **F.LLI MARTINELLI.** They must also promptly report a situation of strong personal interest for themselves or their close family members.

22. Protection and use of Company assets.

F.LLI MARTINELLI owns both tangible and intellectual assets. Employees and collaborators are required to protect those entrusted to them and to safeguard all others. In the event of loss or risk of loss of Company assets, each employee must immediately report the fact to the Management.

The Company's communication systems, including Internet connections, must be used only to carry out the Company's activities or for other instrumental purposes authorized by the respective Management, by the relevant Company directive or by instructions in this regard. The employee must always take care to follow the instructions on the use of passwords and codes assigned to him.

In addition, the Company's intellectual assets must be treated with due care, which are of various kinds and include, among other things, software programs, technical documentation and inventions.

The intellectual property created by employees in the course of their work is transferred and assigned to **F.LLI MARTINELLI** in accordance with the laws in force and/or the respective employment contract or other agreement, without prejudice to the exceptions provided for by international

conventions, local laws or special agreements. At the end of the employment relationship, all assets owned by the Company must be returned, including documentation and media containing **information from F.LLI MARTINELLI.**
The former employee remains subject to restrictions on the use and disclosure of information owned by the Company.

23. Incentive, implementation, supervision and control systems.

According to the rules included in this "Code of Ethics", everyone is responsible for their actions and conduct.

The Management of **F.LLI MARTINELLI** requests that any conduct contrary to this "Code of Ethics" be promptly reported for the appropriate measures relating to violations that may lead to the emergence of liability on the part of the Company and the adoption of corrective actions to be taken.

No one has the authority to require anyone to violate this code of conduct; any such attempt is subject to immediate disciplinary action.

Compliance with the rules of the Company "Code of Ethics" is an essential part of the contractual obligations of **F.LLI MARTINELLI employees**; in the event of violation of one of the rules indicated, the Management will take the appropriate measures as soon as possible in compliance with the laws and regulations in force.

Disciplinary sanctions for third parties who have contractual relations with **F.LLI MARTINELLI,** whether natural or legal persons, consist of the termination of existing contractual relationships, without prejudice to the right to compensation for damages.

All those who report violations of this "Code of Ethics" or any type of crime to the Management or its superiors will not be subject to any type of retaliation by the Company.

Except in cases of slander, defamation and in the event that anonymity is not enforceable by law (e.g. criminal, tax or administrative investigations, inspections by control bodies) the identity of the whistleblower is protected following the report. As regards the scope of the disciplinary proceedings, the identity of the whistleblower may be revealed to the disciplinary authority and the accused only in cases where there is the express consent of the whistleblower or the contestation of the disciplinary charge is well-founded. No form of retaliation affecting working conditions is permitted against the employee who makes a report pursuant to this procedure for reasons directly or indirectly related to the complaint.

In the context of company management, F.LLI MARTINELLI makes use of a private security service (private security force) which is limited to the protection of company assets, in full compliance with the powers attributed to them. As regards protection activities related to firefighting, public security forces (Fire Brigade) can also be used.

24. Management of illegal reports (Whistleblowing).

In compliance with current legislation on whistleblowing, any form of retaliation, discrimination or penalization against those who make such reports in good faith is prohibited.
F.LLI MARTINELLI reserves the right to take any action against anyone who makes untruthful reports in bad faith.

Reports can be communicated or transmitted according to the following criteria:

1) Regular mail	F.LLI MARTINELLI via Occhiali 316B 51028 Fraz. Bardalone San Marcello Piteglio PT (managed by the Resp. Administration).
2) Email	Email address to info@frattellimartinellispa.it
3) F.lli Martinelli Website	Site link https://www.fratellimartinellispa.it/ (footer section, "whistleblowing").
4) ANAC website	Link to the ANAC website https://whistleblowing.anticorruzione.it/#/

The timing for taking charge of reports is 7 days and the closure of the investigation within 90 days.

If, according to the reporter, the report through the internal channels (1, 2 and 3), does not lead to any result, according to the indications of Legislative Decree 24/2023, the external channel is active (link to the ANAC website https://whistleblowing.anticorruzione.it/#/) where it is possible to make any report.
Reports are managed by the group composed of the President, the IT Supervisor and the Quality Manager.
Annually, during the review of the system, an evaluation of the reports and the effectiveness of the procedure in place is carried out.
Without prejudice to legal obligations, the identity of the Whistleblower may not be revealed without the express consent of the same with reference to Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR).

25. Training

The training programs and information events will provide the appropriate tools regarding the content of the Code of Ethics and related guidelines.

26. Approval

Signature and/or stamp for Approval

