

CODE OF ETHICS

Introduction

In this Code of Ethics, Sacchetto intends to define the main guidelines of conduct, in accordance with the SMETA (Sedex Members Ethical Trade Audit) Code.

The role that Sacchetto plays in the market and the nature and social character of its activities presuppose respect for the principles of loyalty, reliability, honesty, competence, and transparency, as well as strict compliance with the law, market rules, and the guiding principles of fair competition. The Company believes that ethical business practices foster entrepreneurial activity, and therefore believes it is important that external relations be guided by compliance with laws and regulations.

Ethical principles

Sacchetto operates in strict compliance with applicable laws and regulations, in accordance with the principles established in this policy and related procedures.

Transparency, fairness, professional commitment, and moral rigor are the values that inspire the Company in order to compete fairly in the market. Specifically, the belief that one is acting in some way to the benefit of the company does not justify the adoption of behaviors that conflict with these principles.

All actions, operations, and transactions relating to the Company must be undertaken and pursued in full compliance with legality, impartiality, and the principles of fair competition; they must be managed with the utmost fairness, must be guided by complete and transparent information, must be supported by documentary evidence, and must be subject to audits and controls.

Relations with the Authorities must be characterized by maximum transparency and collaboration, in full compliance with their institutional roles.

Employees are therefore required to be familiar with the contents of this Policy and to refrain from conduct that conflicts with it.

The fundamental principles of this Code of Ethics are:

- Compliance with laws and regulations;
- Honesty and prevention of corruption;
- Impartiality;
- Correctness in case of potential conflicts of interest,
- Confidentiality;
- Transparency and completeness of information;
- Fair competition;
- Quality of the services and products offered;
- Diligence in carrying out functions;
- Relationships with third parties;
- Protection of the person:
 - Freedom
 - Hygiene and safety
 - Salary and working hours
 - Child labor
 - Forced labor
- Value of human resources;
- Respect for the physical and cultural integrity of the individual;
- Environmental protection. I criteri di correttezza ed etica sopra enunciati si applicano in particolare a:
 - Gestione degli affari in generale;

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- Human resources and employment code of ethics;
- Information processing;
- Information on management facts and accounting data;
- Conflicts of interest;
- Relations with public authorities and institutions and other entities representing collective interests;
- Relations with customers and suppliers;
- Relations with political organizations and trade unions;
- Accounting transparency.

Sacchetto's commitments for the individual sections of the code are listed below.

1. Personnel

Sacchetto avoids any form of discrimination against its employees.

In personnel management processes, decisions are based on the match between expected and actual employee profiles and/or merit considerations. Flexibility in work organization is encouraged, consistent with overall work efficiency, also to facilitate maternity leave management.

Sacchetto provides all employees with information and training tools to enhance their specific skills and maintain their professional value.

Employee involvement in the performance of their work is ensured, including through opportunities for participation in discussions aimed at achieving company objectives. To this end, the company has established an "idea box" where each employee can describe their proposal and list its benefits to the Company.

The company also ensures compliance with the following ILO conventions: ILO Convention 1 (Hours of Work – Industry), ILO Conventions 100 (Equal Remuneration) and 111 (Discrimination – Employment and Occupation), ILO Convention 159 (Vocational and Occupational Reintegration – Persons with Disabilities), ILO Convention 181 (Private Employment Agencies).

2. Safety and health

Sacchetto is committed to spreading and consolidating a culture of safety by developing awareness of risks, promoting responsible behavior by all workers; it also works to preserve the health and safety of workers, especially with preventive actions. In this regard, the Company ensures compliance with the following ILO conventions and recommendations: ILO Convention 102 (Social Security - minimum standards), ILO Convention 155 and Recommendation 164 (Safety and Health at Work).

3. Protection of the person

Sacchetto promotes:

- o The principle of non-discrimination

- o The right to working conditions that respect the dignity of the person.

For this reason, it does not tolerate any form of discrimination under any circumstances and guarantees equal opportunities, dignity, and impartiality for all individuals.

Under national law, the principle of equal treatment in employment and occupation means the absence of any direct or indirect discrimination, as defined below:

- a) direct discrimination when, due to religion, personal beliefs, disability, age, or sexual orientation, a person is treated less favorably than another is, has been, or would be treated in a comparable situation;
- b) indirect discrimination when a provision, criterion, practice, act, agreement or apparently neutral behaviour may place people who profess a certain religion or other ideology, people with disabilities, people of a particular age or sexual orientation in a situation of particular disadvantage compared to other people.

Sexual harassment is not permitted, and behavior or speech that may offend an individual's feelings must be avoided.

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Any employee who believes they have been subjected to harassment or discrimination based on age, gender, sexuality, race, health, nationality, political opinions, or religious beliefs may contact the President.

All work activities are regulated by contractual relationships governed by Italian law. Wages paid to workers are in line with or above the minimum wages established by law, depending on the applicable contract.

In order to protect workers' rights, the company ensures compliance with the following ILO conventions and recommendations: ILO Conventions 29 (Forced Labour) and 105 (Abolition of Forced Labour), ILO Convention 138 and Recommendation 146 (Minimum Age), ILO Convention 182 (Worst Forms of Child Labour), ILO Convention 183 (Maternity Protection), ILO Convention 190 (Violence and Harassment) and ILO Recommendation 206 (Violence and Harassment).

4. Conflict of interest

The company undertakes to counteract the possible prevalence of personal interests.

Therefore, any exploitation of one's position or job which allows one to obtain personal economic advantages and not to the detriment of company interests will be prevented and punished.

5. Relations with public authorities and institutions and other entities representing collective interests

Sacchetto's internal and external employees who interact with state and government authorities, public institutions, and other entities representing collective interests must operate in constant and rigorous compliance with applicable legislation and must base their activities on the general principles of fairness and transparency.

6. Relationships with customers and suppliers

The provisions of this Code of Ethics also apply to external relationships. Therefore, it is necessary to adequately inform third parties and require compliance with obligations that directly affect their business.

External information must be truthful and transparent.

In business relationships with customers and suppliers, donations, benefits, and services of any kind, whether direct or indirect, are prohibited and cannot be interpreted as aimed at obtaining preferential treatment not determined by market rules.

Sacchetto rejects corrupt practices and considers them unlawful.

7. Prevention of money laundering

The Company conducts its business in full compliance with current anti-money laundering regulations and the provisions issued by the competent authorities. To this end, it undertakes to refuse to engage in suspicious transactions, taking into account fairness and transparency.

The Company is therefore required to:

- To verify, where necessary, in advance the information available on commercial counterparties, in order to ascertain their respectability and the legitimacy of their activity before establishing business relationships with these;
- To operate in such a way as to avoid any involvement in operations that could, even potentially, facilitate the laundering of money from illicit or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation and internal control procedures.
- To promote and privilege, as far as possible, the use of tracked or traceable payment systems, improving the transparency of national, community and international commercial operations and transactions.

SACCHETTO

8. Relations with political and trade union organizations

Sacchetto does not directly or indirectly favor or discriminate against any political or trade union organization.

The Company refrains from making any direct or indirect contribution in any form to political parties, movements, committees, and organizations, their representatives, and candidates, outside of those specified in specific legal provisions and in compliance with the forms, methods, and content established therein.

Sacchetto fosters an open relationship with trade unions where, within the framework of applicable laws, opportunities exist to improve collaboration and enable workers to participate fully in the company's objectives.

The Company also ensures compliance with the following ILO conventions: ILO Convention 87 (Freedom of Association and Protection of the Right to Organize), ILO Convention 135 (Workers' Representatives), and ILO Convention 98 (Right to Organize and Collective Bargaining).

9. Management facts and accounting data, accounting transparency

The completeness and clarity of accounting data, reports, and financial statements are a fundamental value in relationships with owners, third parties who come into contact with the Company, and supervisory bodies (where applicable).

Accounting is strictly based on the general principles of truthfulness, accuracy, completeness, clarity, and transparency of recorded data.

Employees and collaborators are required to refrain from any act, whether active or omitted, that directly or indirectly violates the principles set forth in the previous paragraph or the internal procedures pertaining to the preparation of accounting documents and their external representation. Sacchetto is committed to ensuring maximum fairness and transparency in the management of related-party transactions, in compliance with the relevant provisions issued by the Authority.

Sacchetto encourages participation in training and refresher courses.

Financial statements strictly comply with the general principles of truthful and accurate representation of the Company's assets, income, and financial position, in compliance with current general and specific regulations.

Valuation criteria are based on civil law and generally accepted standards.

10. Privacy Policy

The Company ensures the application and constant updating of specific procedures aimed at protecting information.

Sacchetto undertakes to protect the confidentiality of all information of any nature or object that it comes into possession of in carrying out its business activity, avoiding any improper use or undue dissemination of such information.

The Company undertakes to protect the personal data acquired, stored and processed as part of its business, also through training activities for those in charge of data processing on how to use, consult, conserve and destroy the same.

11. Communication

Aware of the importance of honest communication, Sacchetto is committed to ensuring that all communications, whether conducted directly or on its behalf, are legal, correct, honest, and truthful. These communications must also be conducted with due regard for social and professional responsibility, must comply with the principles of fair competition, and must not in any way undermine public trust. Communications must also be consistent with the general principles defined in the

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Consolidated Code of Advertising and Marketing Communications Practice of the International Chamber of Commerce (ICC).

12. Training

The principles of this Code of Ethics are the subject of training within the company.
The training is adequately documented, according to a specific procedure.

13. Reports

Any external organization and internal workforce have the right to report any violations of the Code of Ethics or to share suggestions for improvement, criticisms, or complaints without fear of retaliation. Such reports can be submitted by both external personnel and external stakeholders via the email address hr@sacchettovini.it or, for internal personnel, via the "idea box" on the company noticeboard. All reports and communications will be acknowledged.

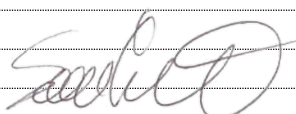
14. Modern Slavery & Human Trafficking Policy

The company rejects all forms of modern slavery in its work organization and human resources management and does not accept it in its supply chain.

It is therefore committed to respecting all forms of human rights protection and requiring adequate guarantees from its suppliers.

15. Revision of the Code of Ethics

The Code of Ethics is reviewed annually.

REV	DATE	SIGNATURE
0	02/28/2019	
1	06/01/2021	
2	07/11/2022	
3	07/07/2023	
4	07/12/2024	
5	07/07/2025	
6	07/16/2026	
7		