



Code of ethics

1. INTRODUCTION

Companies that adopt ethical behaviour positively enhance their reputation in society and local communities.

The Code of Ethics serves as the constant reference for the behaviour to be followed in all operations, decisions and choices; every organisational model and internal procedure is inspired by it.

It forms an integral part of the Internal Control System adopted by Edilfloor and, accordingly, of the “Organisation, Management and Control Model” pursuant to Legislative Decree 231/2001.

All recipients have both the right and the obligation to be familiar with its contents, to actively contribute to its implementation — including by reporting any violations through the existing reporting system — to request clarification in cases of doubt regarding its application, and to flag any gaps or the need for updates and revisions.

Edilfloor SpA and Geosintex Srl (hereinafter, the “Group”, “Edilfloor SpA Group” or “Organisation”) have started implementing a Gender Equality Management System, the common parts of which integrate with the Group’s Corporate Management System. This document describes the behaviour adopted by the Group, contributing to developing, maintaining and reinforcing the policies and procedures adopted and helping to demonstrate to stakeholders that the policies, procedures and practices comply with UNI/PdR 125:2022.

2. GENDER EQUALITY PRINCIPLES

Having implemented a Management System in compliance with UNI/PdR 125:2022, the Edilfloor SpA Group is making the principles expressed by the standard increasingly ‘concrete and effective’ and transposing them into its corporate policies.

To ensure compliance with this system, it has developed specific tools, including the drafting of this CODE OF ETHICS and the adoption of a management system in line with the aforementioned standard.

The Edilfloor SpA Group undertakes to follow and comply with:

- all the gender equality requirements of the UNI/PdR 125:2022 standard;
- all national and international laws on health and safety in the workplace and the protection of privacy, confidentiality and personal data processing;
- the rules of conduct defined in its Code of Ethics.

The Edilfloor SpA Group deems it right to comply with these principles, not only to concretely perform its duty to respect the human rights of workers and ensure gender equality in all its processes and organisations, but also to promote them among its suppliers and partners.

The purpose of implementing this type of management system is to initiate a chain of compliance with the above principles by partners, suppliers and sub-suppliers, in an attempt to influence their behaviour and increase their attention to ethical and social issues.

In order to achieve the above commitments, the Edilfloor SpA Group undertakes to:

- constantly monitor and improve its Integrated Management System by defining specific improvement objectives within the framework of its Management Review meetings, and verifying their achievement;
- implement and store documents and records, and effectively communicate to all staff the principles underlying its Gender Equality Management System;
- provide constant and adequate information to all stakeholders on the results of its Integrated Management System.



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3. PRINCIPLE OF LEGALITY

The Edilfloor SpA Group complies with the laws and regulations in force in the areas and contexts in which it operates; the Group is therefore committed to complying with all national and international rules, laws, directives and regulations and all generally recognised practices.

The Organisation believes in the value of work and considers lawfulness, fairness and transparency of action to be essential prerequisites for the achievement of its economic, production and social objectives, as well as for the non-discriminatory treatment of all company stakeholders.

4. GOALS AND VALUES

Among the Group's main objectives, as reflected in its strategies, is the protection of employees, and the creation of value for stakeholders (e.g. profits, job retention, etc.).

Stakeholders need all the relevant information available to guide them in business strategy decisions, and indeed the Group creates the conditions for widespread and informed decision-making by stakeholders.

5. IMPARTIALITY

In decisions affecting relations with its stakeholders, the Edilfloor SpA Group avoids any discrimination based on gender, nationality, race, health, sexuality, political opinions or religious beliefs.

The Group undertakes to offer its products and services without discrimination between different categories of Customers.

6. CONFIDENTIALITY

The Group guarantees the confidentiality of the information in its possession and refrains from seeking confidential data, unless expressly and knowingly authorised.

In the case of processing personal and sensitive data, pursuant to Reg. (EU) 2016/679, the Group shall adopt all necessary precautions and fulfilments required by law.

All of the Group's staff ensures the utmost confidentiality with regard to news and information constituting the company's assets or relating to the company's business, in compliance with the provisions of the law, current regulations and internal procedures. Furthermore, all of the Group's staff undertakes not to use confidential information for purposes unconnected with the performance of their duties.

7. AUTHORITY EQUITY

In signing and managing contracts involving the establishment of hierarchical relations, especially with its collaborators, the Edilfloor SpA Group undertakes to ensure that authority is exercised impartially, fairly and correctly, avoiding any abuse, respecting diversity and promoting inclusion.

In particular, the Group ensures that authority does not turn into an exercise of power detrimental to the dignity and autonomy of employees or stakeholders, and that work organisation decisions safeguard the value of employees and stakeholders.



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8. CONDUCT IN CONTRACTUAL MATTERS

Contracts and work assignments shall be performed as freely negotiated by the parties. The Group undertakes not to abuse its contractual position.

The Edilfloor SpA Group shall not take advantage of contractual loopholes or unforeseen events to renegotiate valid contracts for the sole purpose of exploiting a position of dependence or weakness in which the other contracting parties might find themselves.

When formulating contracts, the Company shall inform the contracting party clearly and comprehensibly of the conduct to be adopted in all circumstances.

9. CONDUCT IN POLITICAL MATTERS

The Group undertakes not to finance any political movement or party, either in Italy or abroad, and shall not sponsor events or congresses the purpose of which is political propaganda.

However, it may cooperate, also financially, with the aforementioned bodies for specific projects, according to the following criteria:

- a. Aims attributable to the Group's corporate purpose;
- b. Clear and documentable allocation of the resources used.

Without prejudice to the foregoing, the Group may only accede to requests for contributions from bodies and associations that are openly non-profit organisations with proper articles of association and bylaws.

The Group shall only sponsor events and projects, in the social, environmental, entertainment, sports and art fields, that offer a guarantee of quality and to which the Group can constructively contribute its expertise.

10. CONDUCT WITH INSTITUTIONAL BODIES

All relations with Italian and international institutions shall exclusively take the form of communications aimed at assessing the implications of legislative and administrative activities for the Group.

In particular, in order to ensure utmost transparency, all relations with public service providers shall be managed exclusively through contact persons explicitly mandated by the Edilfloor SpA Group.

The conduct of these contact persons shall be characterised by loyalty, fairness and utmost respect for the institutions.

In relations with the Public Administration, in particular, it is forbidden to offer gifts or money to Public Administration Managers, Officials or Employees or their relatives, whether Italian or foreign.

The Group regards as acts of corruption unlawful payments made directly by Italian individuals and/or entities or their employees, and those made through parties acting on their behalf either in Italy or abroad.

It is forbidden to offer and/or accept any object, service, performance or favour to obtain or procure favourable treatment in any relationship with the Public Administration.

The following actions shall not be taken (either directly and/or indirectly) in the course of a business negotiation, request and/or relationship with the Public Administration:

- examining and/or proposing business and/or employment opportunities that may benefit Public Administration employees in a personal capacity;
- offering and/or providing gifts (of any kind and nature);
- soliciting and/or obtaining confidential information that may compromise the integrity or reputation of either or both Parties.



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11. CONDUCT IN SAFETY MATTERS

The Edilfloor SpA Group undertakes to comply with current legislation on health and safety in the workplace, and organises its business and economic management in compliance with same.

The Group undertakes to encourage and consolidate a culture of safety, developing an awareness of risks and promoting responsible behaviour among all its collaborators.

The Edilfloor SpA Group works to preserve the health and safety of workers through preventive actions, guaranteeing the physical and moral integrity of staff, and working conditions that respect the dignity of individuals.

Requests or threats to induce staff to act against the law or against this Code are not tolerated.

12. PROTECTION AND ENHANCEMENT OF HUMAN RESOURCES

Human resources are considered a primary factor in achieving the Group's objectives, within the context of a relationship based on loyalty, fairness, non-discrimination and mutual trust.

The Group safeguards and promotes the value of human resources, favouring their professional growth, striving to avoid discrimination, and guaranteeing equal opportunities, as well as offering working conditions that respect the dignity of individuals and a safe and healthy working environment, in compliance with current regulations and workers' rights.

Relations between different hierarchical levels are characterised by loyalty, fairness and correctness, based on the principles set out above.

13. COMPETITION

The Group undertakes to comply with current fair competition and antitrust legislation. The Edilfloor SpA Group refrains from adopting collusive behaviour and from abusing its dominant position; instead, it complies fully and scrupulously with the antitrust regulations and the directives of the regulatory authorities.

14. ACTS OF COMMERCIAL COURTESY

Any act of commercial courtesy, whether a gift, a gratuity, a favour or any other benefit, shall only be permitted if it cannot be construed as aimed at acquiring an improper advantage.

Persons who receive gifts that cannot be attributed to normal courteous relations shall inform the relevant supervisor without delay.

In any event, irrespective of the duty to disclose, the aforementioned persons shall refuse any benefit promised or offered either to themselves or to a member of their family.

15. CHILD LABOUR

The Group undertakes not to employ persons under the age of 15.

The Group undertakes not to employ young workers (persons under the age of 18) in unhealthy or dangerous situations, nor during school hours.

The Group undertakes not to have recourse to child labour for the manufacture of any product or the provision of any service, with the term child labour referring to the services of persons under the age of 15 who are unable to complete their compulsory education and/or lead a life appropriate to their age.

The Edilfloor SpA Group undertakes to ensure effective learning, growth and professional development conditions for underage workers, as well as suitable health, safety and training conditions.



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16. FORCED LABOUR

The Edilfloor SpA Group condemns, does not resort to and does not support human trafficking.

The Group undertakes not to employ people against their will and ensures its staff is free to leave their employment.

The Group undertakes not to employ any non-voluntary staff (prisoners, persons insolvent towards the Group), any staff subject to non-legal restrictions on their freedom to terminate their employment (seizure of documents, unpaid wages kept as security), and any staff not protected by a form of contract.

In particular, the Group undertakes not to use undeclared labour and to ensure the use of leave by workers, in compliance with the law.

17. FREEDOM OF ASSOCIATION

The Edilfloor SpA Group undertakes not to prohibit, hinder or penalise trade union activities, guaranteeing staff the appropriate conditions to practise this right in the working environment.

The Group undertakes to allow workers to bargain freely and without fear, in accordance with the law.

The Group undertakes to guarantee the freedom to join trade unions by not exerting pressure on those who join, not discriminating against them in their tasks and growth processes, recognising elected representatives as privileged interlocutors, and guaranteeing the place and time to carry out trade union activities.

18. DISCRIMINATION

The Group undertakes to ensure equal opportunities for all workers, and in particular to:

- select workers on the basis of skills and abilities;
- treat all workers equally, offering them equal opportunities and conditions in terms of recruitment, pay, training, promotion, dismissal and retirement.

The Group undertakes not to implement or support discrimination on the basis of gender, race, class, nationality, religion, disability, age, sexual orientation, trade union membership or political party affiliation. The Company does not tolerate threatening, abusive, exploitative or sexually coercive behaviour.

The Group undertakes not to hinder staff in the exercise of their personal right to follow principles or practices, or to meet needs related to race, class, nationality, religion, disability, gender, sexual orientation, trade union membership or political party affiliation.

The Group undertakes not to permit conduct, including gestures, language or physical contact, that may be deemed sexually coercive, threatening, abusive or exploitative.

The Company has implemented a Gender Equality Management System in accordance with UNI/PdR 125:2022.

19. DISCIPLINARY MEASURES

The Edilfloor SpA Group undertakes not to apply disciplinary measures contrary to the worker's dignity and respect for the individual, limiting itself only to the measures provided for by current legislation.

The Group undertakes to treat all workers with dignity and respect, strictly excluding the use of any unusual and/or bodily disciplinary practices. Suppliers' disciplinary practices shall comply with all applicable local laws and current labour regulations. Care must be taken to ensure that 'psychological terror' and 'sexual harassment', i.e. psychological pressure and conditioning with verbal and gestural allusions, do not occur. Moreover, the Company undertakes not to use unfavourable working conditions as 'instruments of punishment', and not to adopt hasty and simplistic disciplinary practices.



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20. PAY

The Edilfloor SpA Group undertakes not to pay workers less than the minimum wage set by legislation.

The Group undertakes to ensure that its workers are paid a wage that complies with all applicable local laws in this regard, including those determining the minimum wage, and allows them to live a dignified life.

21. SUPPLIERS

The Edilfloor SpA Group ensures that relations with customers and suppliers are conducted in compliance with the law and in application of the general principles of this Code of Ethics.

In particular, customer relations shall be characterised by fairness, courtesy and helpfulness. In relations with suppliers, selection processes shall be based on an objective competitive comparison, avoiding any form of favouritism and/or discrimination. Through the Code of Ethics, the Group establishes the minimum requirements with which the Organisation shall comply.

Regarding the action plan concerning suppliers, the Group undertakes to:

- sensitise suppliers to adopt the practices described in this Code of Ethics;
- urge its suppliers to extend their knowledge of the UNI PdR 125:2022 standard and adherence to specific codes of conduct and ethical behaviour to their own suppliers, based on the need to develop a culture and an awareness of social responsibility, in order to make all efforts in this regard effective and efficient.

Resolution of non-conformities/complaints

All suppliers of the Edilfloor SpA Group are encouraged to manage non-conformities and complaints from the perspective of social responsibility, through a process of identification, registration, root cause analysis and resolution.

If a non-conformity or complaint arises regarding a supplier of the Edilfloor SpA Group having a significant impact on the latter, the supplier shall necessarily be obliged to resolve it and communicate the outcome to the Group's Management.

22. IMPLEMENTATION MECHANISMS AND REMEDIAL ACTIONS

Reports of possible violations of the rules contained in the Code of Ethics should be addressed to the Workers' Representatives and/or the Steering Committee for Gender Equality.

The Edilfloor SpA Group shall guarantee that no one in the workplace suffers retaliation, distress or discrimination of any kind for reporting violations of the Code of Ethics.

Violation of the principles set out in this Code compromises the relationship of trust between the Edilfloor SpA Group and its directors, employees, collaborators (in their various capacities) and suppliers and will be dealt with promptly by the Group through appropriate measures.

Failure to comply with the principles set out in this Code of Ethics may be grounds for contractual termination.

In order to protect its image and safeguard its resources, the Edilfloor SpA Group shall avoid establishing relations of any kind with parties who do not operate in compliance with current regulations and in accordance with the values and principles set out in the Code of Ethics.