

## CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct has been designed with the aim of promoting a responsible and ethical work environment in all companies of ZANINI worldwide. It must serve to guide all employees to behave in a way that is in-line with the values of the Company and with ZANINI's commitment to comply with the laws.

Thus, all employees must respect the laws that apply to them and ZANINI, as a responsible company, requires their employees to carefully read this Code of Ethics and Conduct and to behave daily in accordance with it.

Collaboration of all employees is needed, in order to assure the company values and the compliance of the applicable laws, and for this reason it is their obligation to report using the WHISTLEBLOWING CHANNEL available at ZANINI's website, when they consider that somebody acting in the name of ZANINI, is doing (or is about to do) something illegal, contrary to the good practices or failing to fulfil this Code of Ethics and Conduct.

The indications on how to use the Whistleblowing Channel, either to send a complaint or to know how to proceed, are shown in the BULLETIN BOARD or in the intranet, or they can be asked for to Human Resources or the Worker's Legal Representatives of the work center.

Any employee, who in good faith, legitimately and truthfully brings up or reports a concern, Zanini will not allow reprisals against that person. At the same time, Zanini will require that all concerns reported by employees should be based in truth and will not allow accusations based on personal conflict. To report these concerns, Zanini provides with a WHISTLEBLOWING CHANNEL in its website ([www.zanini.com](http://www.zanini.com)).

This code contains the basic principles and is not intended to cover all existing laws or their continuous updates. Therefore, periodic updates of this Code will be published on the intranet and bulletin boards when relevant changes are made. In the event that a local law conflicts with a policy in this Code, the local law will prevail.

The failure to comply the rules contained in this Code of Ethics and Conduct, can give rise to disciplinary sanctions, in accordance with the applicable labor regulations and/or the collective sectorial agreements, notwithstanding the administrative or penal sanctions that could result from it.

### Basic principles of our Code of Ethics and

- A. Zanini promotes **Equal Opportunity** in all aspects of recruitment and work. Diversity is a characteristic and an asset of our Company. We select, hire, train, develop and promote employees taking into account the ability to learn, positive attitude and professional performance. We are committed to the principles of equal opportunity and therefore do not tolerate any kind of discrimination based on race, color, gender, age, religion, national origin, disability, sexual orientation, or any other aspect that may be contrary to the law.
- B. We are committed to maintaining a **professional and safe work environment** in which unethical situations do not arise. We do not tolerate harassment of any kind. Zanini's employees must work in an environment free from violence and must be treated with dignity and respect. Hostile, offensive, sexual harassment, moral, physical, gender, race, religion, or other types of harassment are not allowed. We expect from Zanini's employees a professional and personal behavior based on respect and tolerance, not only with colleagues but with customers, suppliers, and others.

- C. Compliance with **Safety, Health and Environmental Regulations** are essential for Zanini. All employees are responsible for monitoring Zanini's Quality and Environmental Policies and for keeping their workplace and themselves safe and in the best conditions in relation to safety and health practices as well as environmental regulations. Negligent, improper, or reckless behaviors that cause physical harm to themselves, other employees, suppliers, customers, or others is not tolerated at Zanini.
- D. Zanini's employees must maintain the confidentiality of any information entrusted to them by the Company, its customers, or suppliers. Any information of a technical, financial, commercial, or other type of nature, as well as any information about the relationship between the Company and its customers or employees, will be considered **confidential information**; information that the employee may or may not have access to in the course of their work. It also includes all non-public information that may be useful to competitors or harmful to the Company or its customers or suppliers if disclosed. The employee undertakes to observe and maintain the strictest confidentiality of professional secrets, and not to disclose or make available to third parties or in any medium that uses social networks, under any circumstances either on their own behalf or the company this Confidential Information. The obligation of the confidentiality of this information continues even after employment ends.
- E. In accordance with the **Data Protection General Regulation**, each employee undertakes to collect and keep only the information strictly needed for their work performance and to not disclose such data to other employees or third parties.
- F. All **contact with the media** (TV, press, online news, or other online media), or any information requested about Zanini that can be made public, must be authorized by the Management.
- G. Employees must also protect the Company's **intellectual property** such as programs, systems, manuals, courses, videos, patents, trademarks, copyrights, designs, engineering and manufacturing ideas, databases, records, salary information, unpublished financial data, and reports. It is also important to note that any result, discovery, invention, or design obtained during the work performed by the employee during his contractual relationship with the Company will be the exclusive property of the latter. All rights or benefits that derive from any patent, trademark or copyright derived from these works will also be the property of Zanini.
- H. Our business decisions must be based on the best interests of the company and never on personal interests. Zanini's employees must avoid situations in which personal interests may be or appear to conflict with the Company's interests. A **Conflict of interest** may arise in different situations. For example, accepting gifts, bonuses or payments that benefit one's own interests or when it may affect the professionalism of the actions of our workplace.
- I. Zanini's employees and anyone acting on behalf of Zanini are **strictly prohibited from offering, paying or accepting bribes**. Bribes are prohibited, even those that can be made for the benefit of the Company.
- J. The Company prohibits **political contributions**. It is not allowed to donate or authorize, directly or indirectly, any payment to a political party, political organization, or political representative in the name of the company or with its resources or funds.
- K. We seek to outperform our **competition fairly and honestly**. We seek competitive advantages through superior performance, never through unethical or illegal business practices. No employee should unfairly take advantage of someone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other illegal commercial practice. No employee

is permitted to engage in price fixing, bid rigging, market or client sharing or illegal or similar anti-competitive activities.

- L. All employees must **protect the properties**, systems, furniture, machines, or any other assets of the company and ensure their efficient use. Theft, negligence, and waste have a direct impact on Zanini's profitability.
- M. **IT (information technology) systems and communication** such as e-mail, internet, phones, computers, other computer media, etc. must be used **only for professional use related to the activity of Zanini**. These are tools for professional use that should be handled with as much ethical approach as any other relational activity, and the employee clearly commits to do so.
- N. Employees must have special caution in avoiding behaviors that may put at risk the **security of the information generated and processed through computers, mobile phones, networks, and electronic systems**. It is essential to use robust passwords and not to share the access codes that have been individually assigned to employees, it is fundamental to follow the authentication procedures, to be alert (detect and report) potential risks of security like the phishing messages. Also essential is not to install or execute non authorized software at your Zanini IT equipments and avoiding to access non authorized web sites that may contain malicious code and represent an infringement of the intellectual property rights.
- O. **Any invoice made or received by the company must correspond to the reality** of the value of the goods delivered or benefits received.
- P. It is mandatory to comply with the Company's dress code (uniform and safety footwear for plant employees and appropriate clothing depending on work and work position in the case of structure people), as well as with **work schedules and rules of discipline** established in the different work centers.
- Q. The Company takes the problem of **drug and alcohol abuse** seriously and is committed to provide a substance-free workplace to protect the safety and health of all employees, as well as to protect business results. The consumption, sale, possession, or purchase of any alcoholic beverage or any controlled or illegal substance is not allowed in the company's facilities, in a company vehicle, or while carrying out company business. The only exception is for legal drugs, which have been properly prescribed to the employee and are being used in the manner prescribed.

**I acknowledge that I received a copy of the Zanini Code of Ethics and Conduct, that I have read the Code and that I understand it.**

Employee's name: \_\_\_\_\_

Workplace and country: \_\_\_\_\_

Date:

Signature: \_\_\_\_\_