



# **iGuzzini**

# **CODE OF CONDUCT**

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## INTRODUCTION

iGuzzini Illuminazione S.p.A., hereinafter “iGuzzini” or “the Company”, has always based its business on research and innovation, to develop intelligent lighting systems for interiors and exteriors that improve the quality of life for people and the environment. The Company’s strategic thinking is aimed at investing in the continuous improvement of processes, products and services, so as to maintain openings to collaborations and development opportunities with high added value. Our central objective is to pursue long-term sustainable growth with financial and market performance that guarantees benefits for shareholders, collaborators, customers, partners, professional groups and all the local communities the Company forms part of.

Since 2019 iGuzzini has been part of the Fagerhult Group and follows its behavioural guidelines dictated in the Code of Conduct. Everyone in the company is obliged to follow it. The Code of Conduct is also passed on to business partners.

The Code of Conduct provides, among other things, for conducting business as a trustworthy and honest group that respects its commitments. Long-term business relationships are a fundamental value pursued - together with partners - to lay the foundations for solid results, with full respect for people, society and the environment.

The Code of Conduct of the Fagerhult Group incorporates the principles of the Code of Conduct adopted for the first time in 2008 also pursuant to Legislative Decree 231/01.

This Code of Conduct, approved by iGuzzini’s Board of Directors, is a voluntary and unilateral self-regulation tool, aimed at making the company’s activities transparent and ethically directing its performance, in compliance with the legal provisions in force, labour contracts, regulations and internal procedures.

The Code is aimed at regulating and controlling in advance the conduct that Recipients are required to comply with so that:

- the Company’s economic activity is inspired by respect for the law;
- the dissemination of the culture of legality is ensured, including by promoting training and information activities;
- all activities are carried out with transparency, loyalty, fairness, integrity and professional rigour;
- the commission of unlawful acts and offences is avoided and prevented, with particular reference to those provided for in Legislative Decree 231/2001 and subsequent amendments.

In addition to the Fagerhult Group Code of Conduct and the Code of Conduct, the Code of Conduct for Business Partners has been adopted, which aims to convey the Group’s fundamental principles to business partners with the expectation that they will comply with all applicable laws, regulations and their contractual obligations to the Group. These Codes are published at <https://www.iguzzini.com/corporate/who-we-are/governance/>.



## 1. General principles

### 1.1 Recipients and areas of application

The Recipients of the Code - in the performance of their duties and responsibilities - are the members of the Board of Directors and the Board of Statutory Auditors, the employees (including managers) and the persons who collaborate or work in the name, on behalf or in the interest of the Company.

Knowledge of and compliance with the principles of this Code is a prerequisite for establishing and maintaining collaborative relations with collaborators and third parties.

The members of the Board of Directors and of the control bodies, in the exercise of their functions, are inspired by the principles of the Code. Managers must give concrete expression to the Code's values and principles, assuming responsibility internally and externally and strengthening trust, cohesion and team spirit.

All iGuzzini's employees and other persons working to achieve its objectives, in addition to complying with the laws and regulations in force in the various countries in which it operates, will adapt their actions and behaviour to the principles, objectives and commitments laid down in the Code.

In no way may the conviction of acting to the advantage or in the interest of iGuzzini justify, even in part, the adoption of behaviour that goes against the principles and contents of the Code of Conduct.

### 1.2 Communication and diffusion

The Code of Conduct is brought to the attention of internal and external *stakeholders* through appropriate communication activities:

- delivery of a copy - paper or digital - of the Code to all Recipients;
- dedicated sections on the corporate intranet;
- the inclusion of an information note on the adoption of the Code in all contracts.

### 1.3 Obligations of employees and managers

Employees and managers of iGuzzini are obliged to:

- know the precepts contained in this Code;
- refrain from conduct contrary to these precepts;
- contact their superiors for any necessary clarification on how to apply them;
- promptly report to their superiors any news of violation of this Code and any request made to them to violate it;
- collaborate in verifying possible violations;
- in addition, managers must set an example for other employees with their own conduct.

### 1.4 Implementation and control

The Chief People Officer and the Chief Executive Officer of the Company will supervise the correct implementation of the Code and monitor its application.

The Supervisory Body, pursuant to Legislative Decree 231/01, has the task of supervising the functioning and observance of the "Organisation, management and control model pursuant to Legislative Decree 231/01", including the Code of Conduct.

### 1.5 Contractual value of the Code

Compliance with the rules of this Code must be considered an essential part of the contractual obligations of iGuzzini employees pursuant to and for the purposes of Art.2104<sup>1</sup> of the Italian Civil Code.

Violation of the rules of the Code may constitute non-fulfilment of the primary obligations of the employment relationship or a disciplinary offence, with all the consequences provided for by law, including in terms of maintaining the employment relationship, and may entail compensation for any damages deriving therefrom.

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<sup>1</sup> Art 2104 of the Italian Civil Code "Diligence of the employee": *The employee shall use the diligence required by the nature of the work to be performed, by the interests of the company and by the higher interests of national production. He must also comply with the instructions for carrying out and disciplining work given by the employer and by the employer's employees to whom he reports.*



## **2. Rules of conduct**

### **2.1 General rules**

When their actions refer to iGuzzini, employees and external collaborators must maintain business relationships inspired by the principles of loyalty, correctness, transparency and efficiency. Acts of corruption, illegal payments and collusive actions are prohibited.

iGuzzini's essential principle is compliance with the laws and regulations in force, therefore:

- every iGuzzini employee is committed to complying with these laws and regulations;
- iGuzzini employees must be aware of the laws to which they must adapt their behaviour;
- consultants, suppliers, customers and anyone who has relations with iGuzzini must comply with this behaviour.

Every operation and transaction carried out or put in place for the benefit of the Company or in its interest must be correctly recorded, authorised, verifiable, legitimate, consistent and congruous.

All of the Company's actions and operations must be properly recorded and it must be possible to verify the decision-making process, authorisation and implementation.

For each operation there must be suitable documentary support to allow checks at any time to certify the characteristics and reasons of the operation and identify who authorised, performed, registered and verified that operation.

### **2.2 Relations with personnel**

Human capital is a fundamental factor for the development and growth of the Company.

The personnel management policy has always been characterised by great attention to all actions that can contribute to creating better personal and family life conditions for its employees, beyond economic remuneration.

The well-being of those who work within the Company is also achieved through constant attention to the environment, work organisation, mutual solidarity and any initiative capable of creating cohesion and corporate identity.

iGuzzini makes information and training tools available to all staff, with the aim of enhancing specific skills and professionalism, and pays particular attention to training both newly hired staff and staff already operating in the company.

The criteria for selecting personnel to join the company staff only reflect the correspondence of the candidates' profiles with those sought by the Company.

The Company allows all potential candidates equal entry opportunities and makes its selections only on the basis of objective and merit-based principles.

The Personnel Department takes all possible measures, limited to the information in its possession or reasonably obtainable, to prevent clientelism practices from developing in the selection process, and employs all necessary means so that decision-making processes relating to career advancement respond exclusively to merit criteria.

iGuzzini does not tolerate any form of marginalisation and/or persecution, exploitation or harassment of any kind, for work or personal reasons, by anyone, regardless of their level of responsibility or function held, carrying out their activity within the Company and undertakes to protect its employees from acts harmful to the dignity of the person, acts of psychological violence, harassment of any kind and any discriminatory behaviour.

In any case, differences in treatment that are justified or justifiable on the basis of objective criteria (experience, competence, commitment, etc.) are not to be considered as discrimination.

### **2.3 Duties of employees**

The employee must observe conduct based on the principles of good faith, diligence and loyalty, abide by the provisions included in the signed contract, this Code, company procedures and regulatory provisions, and carry out their duties with commitment, honesty and a spirit of collaboration.

Employees are required to entertain any relationships with public and/or private parties in compliance with the provisions of the law and regulations, as well as methods that guarantee transparency.

Without prejudice to the provisions of contractual provisions on the subject or express authorisation, personnel must not take on external assignments in companies or commercial enterprises whose interests directly or even only potentially conflict or interfere with those of iGuzzini and, in any case, must not accept collaboration assignments with persons or organisations that have, or have had in the previous two years, an economic interest in decisions or activities relating to the office.

Personnel must not accept wages or other benefits from parties other than iGuzzini for services that are required from them in performing their office duties.

The personnel do not solicit their direct superiors to grant remunerated positions.

## 2.4 Prevention of corruption

The Company prohibits any form of corruption, whether direct or indirect, active and passive, against any third party with which it comes into contact, be it a Public Administration<sup>2</sup> or a Private Person<sup>3</sup>.

The Company does not allow any form of payment or granting of advantages<sup>4</sup> to any third party if it does not strictly derive from a contractual obligation or a business relationship governed by a contract, and in any case in order to improperly influence their independence of judgement. Recipients may accept or offer gifts in the name or on behalf of the Company, including through third parties (e.g. family members), as long as they are in compliance with locally accepted good business practices and only on condition that the gifts are lawful, of modest value, offered in a transparent and explicit way, occasional or delivered on the usual occasions for exchanging gifts, and such as not to potentially or effectively influence the integrity and independence of those who receive them.

## 2.5 Prevention of conflict of interest

Recipients must avoid (and in any case are required to report) situations and/or activities that could lead to conflicts of interest or could interfere with their ability to make impartial decisions, in safeguarding the Company's interests<sup>5</sup>.

More generally, in relations with third parties, Recipients must act in a correct and transparent manner, with an explicit prohibition of resorting to illegitimate favouritism, collusive practices or solicitation of personal advantages (e.g. money, gifts, favours or other benefits of any nature) for themselves or for others.

To this end, the Company establishes that its employees may not carry out business or other professional activities that compete with its interests and with the purposes it pursues, nor may they participate or collaborate in any way in any transaction, financial operation or investment made by the Company from which they may derive a profit or other type of advantage not contractually provided for, except in the case of express authorisation.

In the event of a conflict of interest, even if only a potential case, the Recipients inform their hierarchical superior or their company contact without delay, complying with the decisions taken in this regard.

## 2.6 Relations with customers

In relations with customers, iGuzzini employees are obliged to:

- provide, with efficiency and courtesy and within the limits of contractual provisions, quality services in line with the customer's reasonable expectations;
- provide accurate, complete and truthful information relating to the services provided in such a way as to allow the customer to make informed decisions;
- act in compliance with the laws and regulations without abusing their qualifications and with impartiality and transparency.

The processing of customers' personal data is guaranteed in compliance with current legislation and this Code. The Company also ensures that data and information are recorded and processed in a complete, timely manner and in compliance with due confidentiality.

## 2.7 Relations with suppliers

In relations with suppliers of products and services, iGuzzini employees must:

- select suppliers on the basis of objective criteria such as the price and quality of the service and product;
- observe the contractual conditions and provisions of the law;
- maintain relationships in line with good commercial practices;
- act in compliance with the laws and regulations without abusing their qualifications and with impartiality and transparency.

## 2.8 Relations with the Public Administration

It is prohibited to carry out activities, in any form, which result in the illicit conditioning of the Customer.

The following principles must be respected in the relationships each employee has, including through third parties, with the Public Administration:

- when taking part in public tenders or in the case of other dealings with a public administration, it is necessary to always operate in compliance with the law and proper business practice, with the express prohibition of attempting to improperly influence the counterparty's decisions, including those of officials dealing with or making decisions on behalf of the Public Administration, or to solicit or obtain confidential information that may compromise the integrity or reputation of both parties;

<sup>2</sup> "Public Administration" or "Public Institutions" shall mean, in any country, all public institutions/associations and state, regional and local public administrations, and, in general, all those parties delegated directly or indirectly to taking care of a public interest or whose representatives may be qualified as public officials or persons in charge of a public service under the national or international legislation in force. In particular, a public official is any person, appointed or elected, exercising a legislative, administrative or judicial function, any person exercising a public function or for a public body or a public enterprise, and any official or agent of a public international organisation.

<sup>3</sup> The category of "Private Persons" includes, on the other hand, by way of example but not limited to, employees, customers (potential or current), suppliers, subcontractors, consultants for the procurement of goods, services and professional services, as well as any other private party with which the Company has commercial or institutional relations for any reason whatsoever.

<sup>4</sup> In particular, not only money or other economic advantage, but also any benefit or consideration capable of unduly influencing the counterparty in order to gain an undue advantage for the Company or of a personal nature for the agent, which results even only in reputational damage for the Company, may represent instruments of corruption.

<sup>5</sup> Conflict of interest means the case in which Recipients have an interest of their own, or of third parties different from that of the Company, or perform activities that may, in any case, interfere with their ability to make decisions in the Company's exclusive interest, or personally take advantage of business opportunities of the same.

- it is not permitted, either directly, indirectly or through a third party, to offer money, gifts or compensation in any form whatsoever, or to exert undue pressure, or promise any object, service, performance or favour to managers, officials or employees of the Public Administration or to their relatives or cohabitants;
- it is prohibited to hire former Public Administration employees (or their relatives), who have personally and actively participated in the relationship, as employees of the entity;
- it is not permitted to submit untrue declarations to national or EU public bodies in order to obtain public grants, contributions or soft loans, or, in any case, in order to obtain any financial advantage or to obtain concessions, authorisations, licences or other administrative acts;
- it is prohibited to allocate sums received from public, national or Community bodies, in the form of grants, contributions or loans, for purposes other than those for which they were assigned;
- it is prohibited to alter the functioning of an IT or telecommunications system or to manipulate the data contained therein in order to obtain an unfair profit, damaging the Public Administration.

## **2.9 Health and safety in the workplace and environmental protection**

Environmental protection and health and safety in the workplace are at the top of iGuzzini's priorities.

To this end, the Company has prepared an Occupational Safety Management System ("SGS"), in compliance with current laws, adequately published on the company intranet and disseminated to all employees and collaborators.

The SGS system is inspired by the following principles and criteria, aimed at protecting workers' health and safety:

- avoiding risks;
- assessing and mitigating risks which cannot be avoided;
- combating risks at source;
- adapting work to the needs of people, in relation to the jobs and equipment available;
- taking technological developments into account,
- replacing potentially dangerous equipment and tools with others that are not or less dangerous,
- carefully planning prevention,
- giving priority to collective protection measures over individual protection measures,
- giving adequate instructions at all levels on the measures and the safety system at work.

iGuzzini adheres, at all levels, to the aforementioned principles and criteria when decisions regarding safety in the workplace must be taken.

The Company undertakes, within the limits of the provisions of the relevant legislation in force, to maintain a working environment that is attentive to safety and to provide its employees, depending on the activity carried out, with all the appropriate and necessary equipment to protect them from any risk or danger to their integrity.

To this end, the Company informs all employees of the conditions imposed by law, as well as the practices and procedures adopted by the Company in the field of health and safety.

Employees, in turn, undertake to comply with the conditions imposed by law and by any practices and procedures adopted by the Company.

The Company also maintains its plants, offices and operating systems in such a way as to comply with all safety standards.

In relation to activities with a possible environmental impact, the Company's commitment is to comply with environmental legislation by implementing preventive measures to avoid or at least minimise this impact.

To protect the environment, iGuzzini:

- takes measures to limit and - if possible - eliminate the negative impact of the economic activity on the environment, not only when the risk of harmful or dangerous events is proven but also when it is not certain whether and to what extent the business activity exposes the environment to risks;
- gives priority to taking measures to prevent damage to the environment, rather than waiting until the damage has been repaired;
- plans careful and constant monitoring of scientific progress and regulatory developments in the environmental field;
- promotes the values of training and sharing the principles of the code among all those working in the Company so that they comply with the established ethical principles, in particular when decisions have to be taken and, subsequently, when they have to be implemented.

Finally, iGuzzini carries out periodic audits and checks to ensure that all safety measures are effectively implemented and complied with, and takes prompt action where corrective measures are required.

Employees are in any case obliged to report any action or condition not in conformity with safety to the designated manager.

Any form of retaliation against employees who raise health and safety issues in good faith is strictly prohibited.

## **2.10 Relations with press and media**

The Company addresses the press and mass media solely through the corporate bodies and the corporate functions delegated for this purpose, in an attitude of utmost fairness, availability and transparency, in compliance with the communication policy defined by the Company.

Any director or employee contacted by a representative of the media shall refrain from providing any data whatsoever and promptly inform the function appointed for that purpose.

Directors and employees may not under any circumstances offer payments, gifts or business opportunities to influence the professional ethics and impartiality of information and communication professionals.

### **2.11 Confidentiality**

iGuzzini:

- ensures and guarantees the confidentiality of the information in its possession;
- protects, without prejudice to legal and contractual obligations, the confidentiality of information relating to its staff and stakeholders;
- ensures the confidentiality of its employees' correspondence and personal documentation in all possible forms;
- adopts standards providing for the prohibition, subject to exceptions provided for by law, on communicating and disseminating personal data without the prior consent of the data subject and establishing rules for monitoring privacy protection standards;
- processes personal data and confidential information in accordance with the relevant laws and applicable best practices;
- excludes any form of investigation into the ideas and, in general, the private life of individuals.

Each employee must be familiar with and implement the company's information security policies to ensure the integrity, confidentiality and availability of information.

### **2.12 Fair competition**

iGuzzini recognises the value of fair competition as a tool for efficiently allocating community resources, and undertakes not to behave in a collusive or profiteering manner or in such a way as to abuse any dominant position.

Recipients are required to comply with all applicable laws protecting fair trade and to refrain from actions that could lead to unfair commercial practices.

### **2.13 Transparency and fairness in relations with shareholders and in the management of corporate information**

The Company is committed to providing timely and transparent information to shareholders and stakeholders in a correct and complete manner, adopting tools of connection and dialogue in line with the best market practices.

The Company believes that transparency in accounting and keeping accounting records in accordance with the principles of truthfulness, completeness, clarity, precision, accuracy and compliance with the regulations in force are fundamental prerequisites for efficient control.

In order for the accounting documents to meet the above requirements, adequate and complete supporting documentation is kept on file for each accounting operation carried out, so as to allow:

- accurate and faithful accounting records;
- immediate identification of the characteristics of and reasons for the transaction;
- easy reconstruction of the operational and decision-making process and identification of levels of responsibility;
- the performance of control or audit activities legally attributed to shareholders, the Board of Statutory Auditors, other corporate bodies or the auditing firm.

The Company's corporate assets are managed fairly and honestly, therefore all Recipients shall contribute to safeguarding their integrity so as to provide them with maximum protection.

To the extent that it concerns them, each Recipient shall act in such a way as to ensure that all management data is correctly and promptly recorded in the accounts.

In the management of the Company's activities, the Recipients are required to provide, also externally, transparent, truthful, complete and accurate information, refraining from spreading false information or carrying out simulated operations.

No Recipient may provide information to the press or other means of communication and information without prior authorisation from the persons in charge of external communication.

With particular reference to preparing financial statements, the Company considers the truthfulness, correctness and transparency of financial statements, reports and other corporate communications required by law to be an essential principle in conducting business and a guarantee of fair competition. Consequently, no concealment of information or partial or misleading representation of the Company's economic and financial data by the management and the competent corporate functions is allowed. Therefore, all internal and external collaborators involved in producing, processing and accounting for such information are responsible for the transparency of the Company's accounts and financial statements.

The Recipients are required to strictly observe all the rules laid down by law to protect the integrity and effectiveness of the share capital, so as not to prejudice the guarantees of creditors and third parties in general.

### **2.14 Combating money laundering and terrorist financing**

The Company is committed to the international fight against money laundering and terrorist financing. In their respective work environments, Recipients may not engage in or tolerate actions that violate domestic or foreign anti-money laundering regulations.

### **2.15 Quality of our products and services**

The Company pays particular attention to the quality of its products and services, with a view to ensuring the satisfaction of its customers, in line with the reputation that has always distinguished its work.

The Recipients are therefore called upon to provide true, accurate and exhaustive information on the quality and type of materials, products and services offered, and to conduct adequate checks on the quality and professionalism of material suppliers and/or those to whom customer service activities are entrusted.



### **2.16 Protection of industrial and intellectual property**

In implementation of the principle of compliance with the law, the Company ensures compliance with internal, EU and international rules for the protection of industrial and intellectual property.

Recipients shall protect the intellectual property of the Company, customers and third parties in general (e.g. trademarks, copyrights, trade secrets) and promote the proper use of all intellectual works, including computer programs and databases, to protect the author's patrimonial and moral rights.

To this end, it is prohibited to engage in conduct aimed, in general, at duplicating or reproducing others' work in any form and without the right. The use of unauthorised software and databases on Company computers is prohibited.

### **2.17 Combating tax fraud and smuggling**

The Company ensures compliance with all applicable tax and customs regulations.

The Company undertakes to comply with tax obligations within the terms and in the manner prescribed by law or by the competent tax authority.

The Company undertakes to represent the acts, facts and transactions undertaken in such a way as to render applicable forms of taxation consistent with the real economic substance of the operations.

The Company undertakes to fully and truthfully represent the information required to fulfil customs formalities for exports and imports and to pay the border duties due on time.

In any case, the Company undertakes to cooperate with all tax and customs authorities with the utmost transparency.

### **2.18 Transparency of accounts and corporate communication**

Every operation and transaction carried out at iGuzzini must be correctly recorded. Each transaction must be supported by adequate documentation, so that checks can be carried out to establish the characteristics of and reasons for the transaction and to identify who authorised, performed, recorded and verified that transaction.

The financial statements, reports and corporate communications required by law must be drawn up, in compliance with the provisions of the code and the accounting principles, with clarity and transparency and to give a true and fair view of the company's assets and liabilities and financial situation.

All iGuzzini personnel involved in the process must:

- provide clear and complete information;
- ensure the accuracy of data and processing;
- report conflicts of interest.

All iGuzzini personnel involved in the process are also prohibited from:

- interfering, in any way whatsoever, with the content of the reports or communication from the auditors influencing their independence;
- preventing or hindering the proper performance of the activities of the corporate bodies, the auditors and the shareholder, cooperating, where required, in the performance of any form of control and audit of the corporate management, as provided for by law. In particular, it is prohibited, through the concealment of documents or the use of other fraudulent means, to behave in such a way as to prevent, or in any case hinder, the performance of the control or audit activities legally attributed to the shareholder, the Board of Statutory Auditors or the audit company.

### **2.19 Internal controls**

iGuzzini spreads a control-oriented mentality at all levels for the contribution it makes to improving efficiency.

Internal controls are defined as the tools necessary to direct, manage and verify the activities of each individual company function with the aim of ensuring compliance with the law and company procedures, protecting the company's assets, efficiently managing activities and providing accurate and complete accounting data.

The responsibility for implementing an effective internal control system is common to every level of the organisational structure. Therefore, all iGuzzini employees, within the scope of their positions, are responsible for the definition and correct functioning of the control system, and for no reason whatsoever will they be induced to perform or omit acts in violation of their professional obligations and contrary to the Company's interests.

To this end, and from an organisational guarantee perspective, the Company ensures an internal redistribution of work such as to ensure that:

- there is an adequate level of segregation of responsibilities, so that the implementation of each process requires the joint support of different corporate functions;
- all iGuzzini's actions and operations are adequately recorded and it is possible to verify the decision-making, authorisation and execution process;
- each operation has adequate documentary support to allow checks at any time attesting to the characteristics and reasons for the operation and identifying the persons who authorised, carried out, recorded and verified the operation itself;
- all internal documentation is kept in an accurate, complete and timely manner in accordance with company procedures.



## **2.20 Use of company assets and IT security**

In order to protect the company's assets, each employee and collaborator is required to work diligently, through responsible behaviour and in line with the operating procedures prepared for their use, accurately documenting their usage. In particular, each employee and collaborator must:

- use the assets entrusted to them scrupulously and sparingly;
- avoid improper use of the company's assets, which may cause damage or reduction of efficiency, or be otherwise contrary to the company's interests;
- everyone must feel as though they are a responsible custodian of iGuzzini's assets, and no employee may make improper use of them;
- employees and collaborators are responsible for protecting the resources entrusted to them and have the duty to promptly inform their supervisor of any event detrimental to the Company.

With reference to the use of IT tools and, in particular, e-mail services and internet access, conduct must be inspired by canons of correctness and comply with the law and specific company rules on the subject. Employees work on company computers exclusively to perform work activities authorised by the Company, unless specifically authorised by the relevant company manager.

In particular, the aforementioned personnel are strictly prohibited from accessing, copying, modifying or disclosing the customer's software and/or information relating to the customer's organisation, or from intercepting communications outside the authorisations/permissions granted by the customer and, in any case, for purposes outside the scope of the services provided by the Company. It is also strictly prohibited to create false computer documents and to damage company data and information or computer and digital systems.

For correct use of IT tools and the applications they contain, the employee is required to observe all measures necessary to preserve their functionality.

### 3. Violations of the code: reporting procedures and sanction system

Violation of the provisions contained in this Code of Conduct constitutes a disciplinary offence, liable to prosecution under the law and/or the applicable CCNL and, as far as external collaborators are concerned, a contractual offence.

Following the implementation in Italy of the EU law related to *whistleblowing*, with the D. Lgs. 24/2023 ("Decreto Whistleblowing"), starting from 15 July 2023, it will be available an anonymous or confidential messaging through the whistleblower reporting channel to the whistleblowing team: <https://report.whistleb.com/en/fagerhultgroup>. The channel is managed by a third party company and it is totally separated from the IT environment of the Company. The reports that can be sent through this channel are all those found in the cases indicated by Legislative Decree 24/2023. The team responsible for receiving reports and managing cases consists of the Managing Director and CPO.

The Company ensures the reporting party is protected from any possible retaliation and does not allow the adoption of any kind of disciplinary and/or sanctioning consequence for reports made in good faith.

If the reports received require, in compliance with the regulations in force, confidential treatment (including maintaining an anonymity profile), the Company undertakes to protect such confidentiality, without prejudice to the provisions of the law, the applicable CCNL, the regulations or the procedures applicable to the case in question.

This Code does not cover all situations. We may find ourselves confronted with ethical issues that are difficult to resolve. In such cases, the following questions should be asked about the behaviour we intend to adopt:

- is it legal and ethical?
- can I explain it to my family and friends?
- would I feel comfortable if it was published in a newspaper?

The Supervisory Body is available to clarify any doubts about conduct in relation to the Code.