

ETHICAL CODE

Calceranica al Lago (Trento)

Rev.01 - 20/05/2025

[linkedin.com/company/coster-group](https://www.linkedin.com/company/coster-group)



foreword & purposes

The Coster Ethical Code is an official document of Coster Group, i.e. the group of companies formed by Coster Tecnologie Speciali S.p.A. and the sister companies under its direct control (Coster, hereinafter). It provides a set of commonly agreed values and principles which reflect Coster's commitment towards conducting business responsibly.

The Coster Ethical code is built on 3 key pillars:

- 1) Be lawful and act with integrity in the marketplace
- 2) Respect human rights and create a positive workplace
- 3) Safeguard the environment and the health of future generations

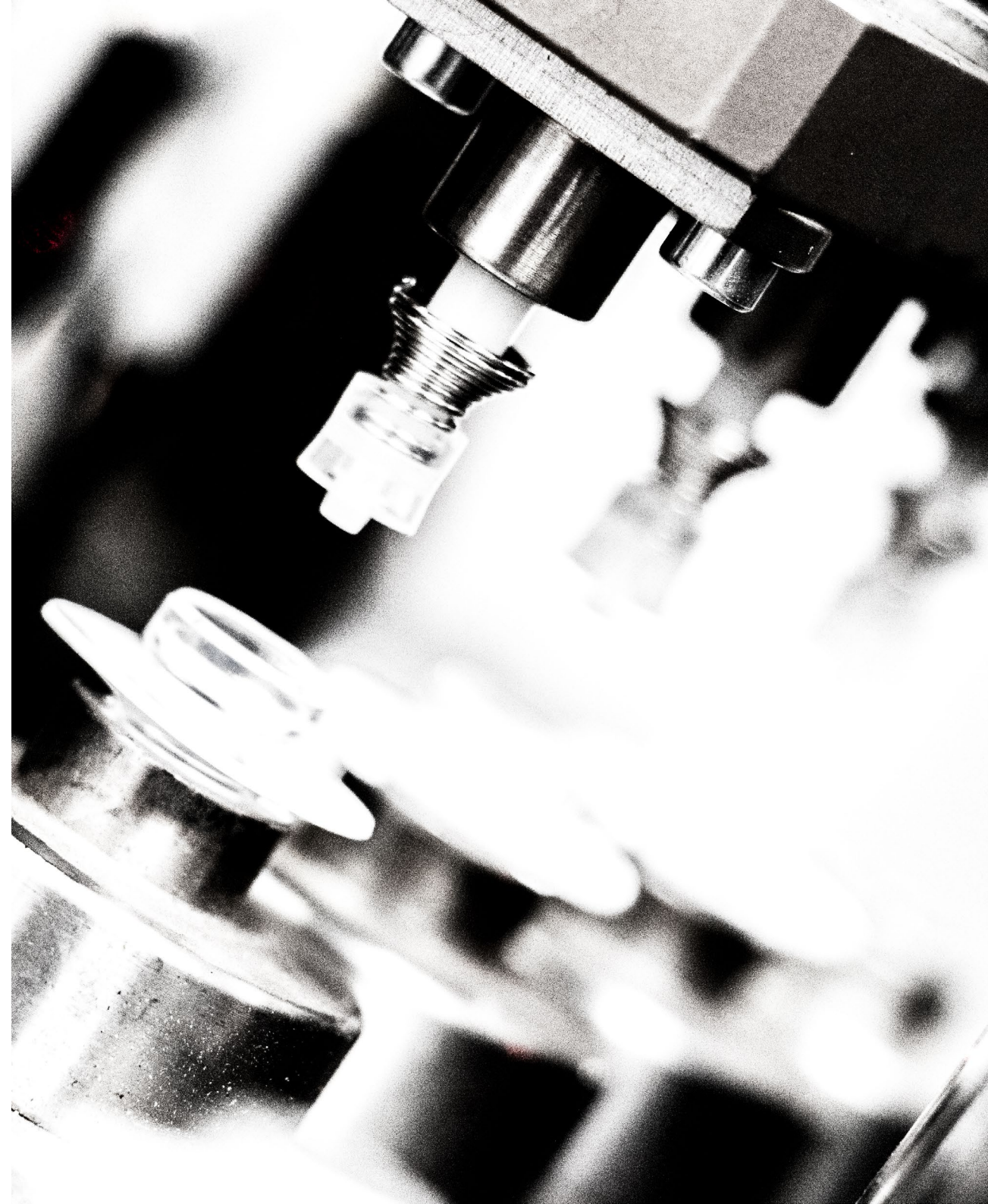
All of Coster's management and employees are bound to observe the Coster Ethical Code.

The Coster Ethical Code is a public document available to anyone and Coster is committed to promoting it internally with all means. The Code of Ethics is also an integral part of the Organizational Model adopted and implemented by the company, aimed at outlining the set of operational and ethical rules established by the Company in relation to its specific activities and in accordance with current legislation

As well, Coster distributes and promotes the Ethical Code to the Suppliers through the supply chain, with the request to formally commit to acknowledging and adhering to the principles outlined in the Suppliers' Code of Ethics.

The Ethical Code has been approved by the Board of Directors of Coster Group.

communication channels



Every Coster company has established appropriate and accessible communication channels available to all employees to report on the Code. The channels shall be widely communicated and the anonymity of the user always guaranteed as well as the confidentiality of any complaint, if desired. Any matter communicated via the channel is required to be fully investigated and result in a fast and unbiased resolution. Any form of retaliation based on complaints communicated via the channel is strictly forbidden. Every subsidiary has / will have nominated a local responsible for the channel. Unless otherwise stated, this role normally coincides with the local HR function.

The IntegrityLog platform is the tool used to communicate, also anonymously and in compliance with technical and organizational requirements for security and personal data protection, regarding commercial/financial, research and design, manufacturing, environment, health, safety, ethical matters and any other questions and suggestions relating the Code for the purpose of helping Coster to identify and address them in a positive and constructive way.

Although direct discussion with one's supervisor is the preferred mode, in some circumstances an employee may feel the need for a more confidential, if desired

anonymous ability to express good faith concerns about presumed non-compliance. The reports generated through the use of the platform are created and stored on a secure server to prevent potential security breaches. Coster makes these documents available to specific individuals appointed as members of a Committee, based at the headquarters, who are responsible for assessing the nature of the issue and the location where it occurred, and who understand the importance of maintaining confidentiality. The Committee members receive specific training related to the management of the communication platform and the responsibilities of their role, which requires a high degree of autonomy, expertise, and impartiality.

The management of reports is governed by a dedicated internal regulation and is based on procedures developed by our internal control body, under the direct supervision of the Chairman of the Board and Chief Executive Officer.

The tool available for submitting reports to the Coster Committee is the IntegrityLog platform, accessible via the Coster website through the direct link <https://coster.integrity.complylog.com/> or from the company portal CNN.

lawful conduct & business integrity

a. bribery

Coster is committed to highest standards of integrity, honesty and fairness in all internal and external affairs. Coster is also committed to fully comply with all national and international anti-corruption laws, in particular:

- OECD Convention on Combating Bribery of Foreign Public Officials
- OCSE Guidelines and Foreign Corrupt Practices Act

Bribes, illegitimate favours, collusion, requests for personal benefits for oneself or others, either directly or through third parties, are prohibited without any exception.

b. competition and competitor information

Coster recognizes the importance of a competitive market and is committed to fully comply with all anti-trust and pro-consumer laws in force in all countries where it operates. Coster's management and employees will not engage in business practices (i.e. price cartels) which may represent an anti-trust violation.

All information about Coster's competitors is obtained legitimately and will only be used for legitimate purposes in compliance with all anti-trust laws and regulations.

c. compliance with laws

Coster is committed to ensuring that its business activities do not violate applicable domestic or international legislation in all countries where it operates.

d. confidentiality obligation

The know-how and intellectual property developed by Coster is a fundamental and critically valuable resource which all of Coster's management and employees are called upon to protect. Coster's management and employees are bound not to reveal to third parties any information regarding the technical, technological and commercial know-how of Coster, nor any other information regarding Coster that is not in the public domain, except cases in which such disclosure is required by law or by other regulatory directives, or where it is expressly provided by specific contractual agreements whereby the parties have committed themselves to using such information exclusively for the purposes for which it was transmitted and to maintaining its confidentiality.

All confidential information, know-how and intellectual property provided by third parties such as suppliers, clients and outsourced service providers must be equally respected and safeguarded according to the above principles and only used for its intended and designated purpose.





e. conflicts of interest

All decision taken on behalf of Coster must be made in the interest of Coster. Coster's management and employees must avoid every possible conflict of interest, particularly with regard to personal, financial or family considerations (i.e. the existence of a vested interest in a supplier) with the role performed within the company.

Coster's management and employees shall avoid and report any conflicts of interest between personal and family economic activities and their tasks within the company. Any situation that constitutes or might constitute a conflict of interest must be reported immediately to the direct supervisor.

f. financial records, money laundering and insider trading

All of Coster's business and commercial dealings must be transparently performed and accurately recorded in the books and records.

The transparency, accuracy and completeness of the balance information have noteworthy relevance. At this regard, every employee is required to collaborate to ensure that the management facts are properly represented.

Coster's management and employees will not be engaged or involved in any activity which may imply the laundering of proceeds of criminal activities in any form or manner whatsoever. Before establishing any business relationship with a third par-

ty, Coster shall check available information (including financial information) on its proposed business partners and suppliers to ensure that they are reputable and involved in a legitimate business. Coster shall always comply with anti-laundering legislation in all countries where it operates.

Coster's management and employees are strictly required to comply with the insider trading legislation in all countries where it operates. In particular, Coster's management and employees shall never make use of information not in the public domain and obtained as a result of her/his position within Coster in order to obtain a personal advantage or to favour third parties.

g. gifts, hospitality and entertainment

Commercial courtesy, such as small gifts or forms of hospitality, is only allowed when its value is small and it does not compromise the integrity and reputation of either party, and cannot be construed by an impartial observer as aimed at obtaining undue advantages. In any case, these expenses must always be authorized by the designated managers and be accompanied by appropriate documentation. It is forbidden to accept money from individuals or companies that have or intend to have business relations with Coster.

Anyone who receives proposals of gifts or special or hospitality treatment that cannot be considered as commercial courtesy of small value, or requests therefore by third parties, shall reject them and immediately inform the direct supervisor.

h. privacy

In the conduct of its normal business operations, Coster collects a significant amount of personal data and proprietary information and is committed to processing such data and information in compliance with all existing privacy laws in force in any jurisdiction where it operates.

employees & working rights



Coster recognizes the importance and supports the protection of human rights. Coster is committed to complying with the UN Declaration of Human Rights. All of Coster employees and management are bound to comply with following principles.

a. child and forced labour

Coster does not employ any form of forced, mandatory or child labour, i.e. it does not employ people below the permissible working age established by the laws of the place where the work is carried out. In any case, no workers under the age of 15 will be employed under no circumstance. Coster is also committed to not establishing or maintaining working relationships with suppliers that employ child labour as per the above definition.

Work is conducted on a voluntary basis within Coster. Any form of forced labour is not accepted. Mental and physical coercion, slavery and human trafficking are prohibited.

b. equal opportunities

Coster is committed to ensure equal opportunities to all its employees, on the job and on the career advancement.

The head of each company / department shall ensure that in every aspect of the employment relationship (e.g. recruitment, training, compensation, promotion, transfer) employees are treated according to their abilities to meet the job requirements. All decision shall be free from any form of discrimination (e.g. gender, race, sexual orientation, social and personal position, physical and health condition, disability, age, nationality, religion, political orientation, personal beliefs).

Any kind of health screening (i.e. pregnancy testing) that might result in discrimination are strictly prohibited.

c. freedom of association

Coster employees are free to join a trade union in accordance with local laws and the rules of trade union organisations. Coster recognises and respects the right of representation of its employees and no employee is intimidated or harassed in the exercise of her/his rights to join or refuse from joining any organisation.

d. harassment

Harassment of any kind, such as racial or sexual harassment or harassment related to other personal characteristics which has the purpose or the effect of violating the dignity of the person who is the victim of such harassment, is not tolerated by Coster whether it takes place inside or outside the workplace.

e. hiring and promotion practices

No Coster employee shall accept or demand promises or transfers of money or goods or benefits, inducements or services of any kind whatsoever that may be designed to promote the hiring of any person as an employee or further his/her transfer or promotion.

f. occupational health and safety

Coster recognizes health and safety in the workplace as a fundamental right of employees. Any decision taken by Coster must respect the health and safety in the workplace and comply with at least the minimum standards of the legislation of the countries where it operates.

Coster has adopted and continues to improve efficient occupational health and safety policies which implements preventive measures, both at the individual and collective level, to minimize the potential for injury in the workplace.

Coster also seeks to ensure industry leading working conditions, in accordance with principles of hygiene, industrial ergonomics and individual organizational and operational processes. Coster believes in and actively promotes the dissemination of a culture of accident prevention and risk awareness among workers, in particular through the provision of adequate training and information.

Coster Employees are required to be personally responsible and to take the preventive measures established by Coster for the protection of their health and safety and communicated through specific directions, instructions, information and training. Each employee is responsible for proper management of safety and should not expose him/herself or other workers to dangers, which could cause injuries or be damaging for themselves.

All Coster workers have freedom of movement and are not confined to Coster's premises.

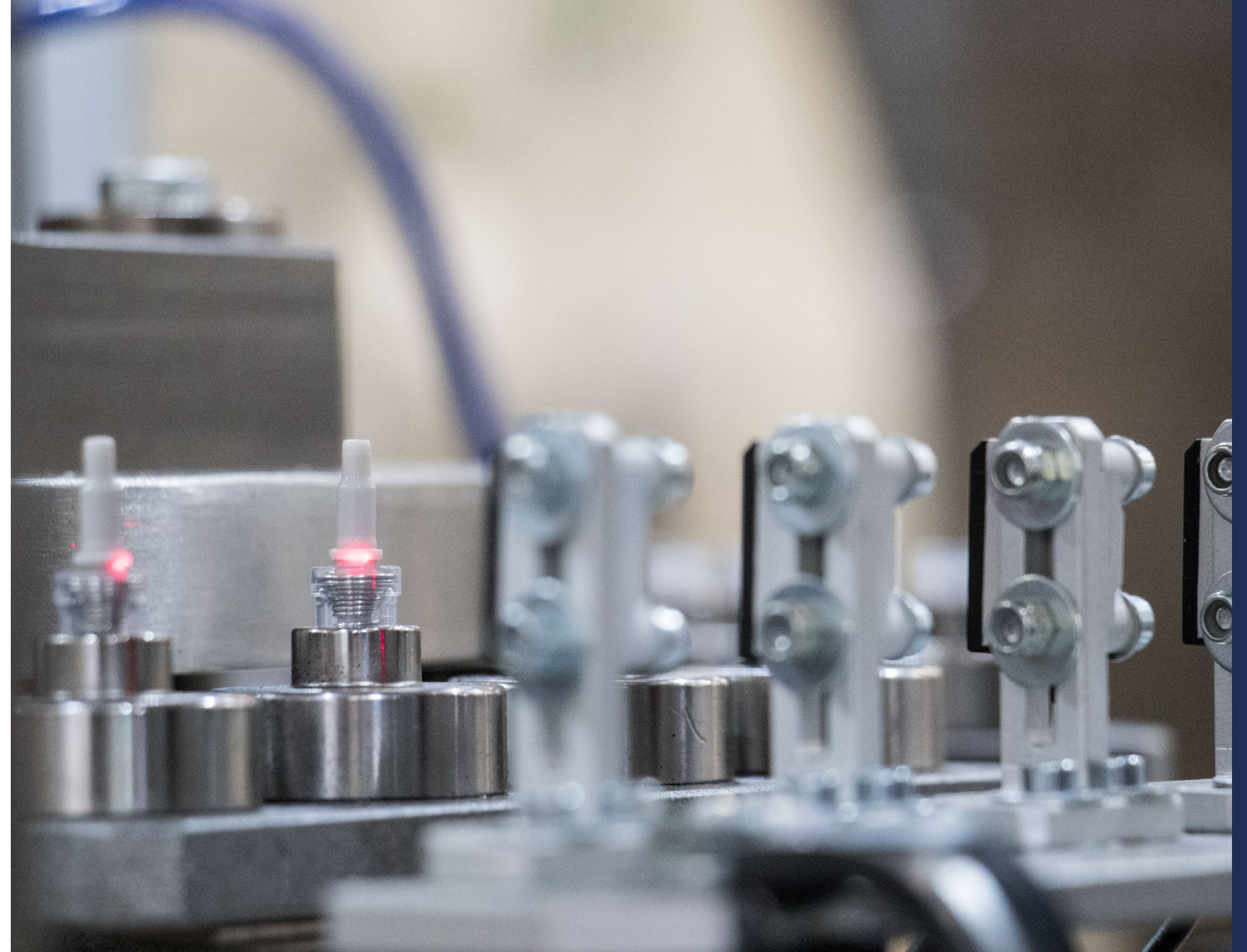
g. remuneration and working time

Compensations and benefits paid to Coster's employees will satisfy at least the applicable legal minimum standards in all countries where it operates. Where applicable, the compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.

Coster complies with local legislation and business practices of the countries where it operates in relation to working time (regular and overtime). No employee will be requested to work more than the hours allowed by the countries where it operates. All overtime work is on voluntary basis and paid at least the rate defined by the local law.

h. terms of employment

All work is conducted on a voluntary basis. Employees working within Coster do it freely and on agreed and document terms of employment that satisfy at least the applicable minimum standards of the legislation of the countries where Coster operates. All employment contracts are in a language understood by the worker.



sustainability & land rights



a. sustainability

Coster considers environmental protection as a key consideration to be fostered in the overall approach to business.

Coster is committed to continuous improvement of the environmental performance of its operations and to complying with all relevant legal and regulatory requirements of all countries where it operates.

Coster stimulates and motivates employees to take an active part in the implementation of these principles through information dissemination and regular training and expects the employees to have an active role in applying such principles in their working activity.

Coster is also committed to producing and selling, in full compliance with legal and regulatory requirements, products of the highest standard in terms of environmental and safety performance. Coster also strives to develop and implement innovative technical solutions to minimize environmental impact and maximize safety. Energy saving, monitoring and reduction of greenhouse gas emissions, control of all forms of energy consumption, and proper waste management are key pillars of Coster's strategy to reduce its footprint and promote environmental care and sustainability.

Coster encourages the safe and environmentally responsible use of its products by providing Customers with information regarding their use, storage, and disposal.

b. land rights

Coster adopts a zero-tolerance approach to land grabs and the rights and title to property and land of the individual, indigenous people and local communities are respected.

Coster adheres to the principles of Free, Prior and Informed Consent (FPIC) in all negotiation with regard to the property or land of the individual, indigenous people and local communities. A due diligence is undertaken to uphold individual or indigenous people's established rights to property and land, where applicable.

infraction of ethical code rules



The rules included in the Ethical Code integrate the behavior which every employee is required to observe by virtue of the applicable law and the obligations provided by collective bargaining agreements.

The infraction of Ethical Code rules prejudices the relationship of trust between employee and Coster and it may cause a disciplinary or legal action, if it is deemed as a breach of the contractual obligations of employment relationship or professional co-operation.

In the most serious cases the violation can determinate the termination of the employment contract, if it is put into effect by an employee, or the termination of the business relationship, if it is put in place by a collaborator or a third party (supplier, etc.).

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