

# CSP

INTERNATIONAL  
FASHION GROUP



## CODE OF ETHICS

Edition of 30 June 2023

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## FOREWORD

The company's history began in 1973 as a manufacturer of women's hosiery in the industrial district of Castel Goffredo (Mantua).

CSP International Fashion Group (hereinafter more simply 'CSP' or the Company) has deemed it appropriate to collect and publish the set of those values and principles that have always characterised its activities, its relations with employees, collaborators, customers, suppliers, shareholders, partners and Public Authorities, i.e. all those with whom it has business relations.

CSP International Fashion Group's mission is to produce and distribute the highest quality products worldwide, innovating in the core business of hosiery and diversifying into underwear and swimwear.

CSP is determined to ensure the utmost correctness in the conduct of its business and related activities, also to protect its image and reputation, and has chosen to comply with the provisions of Legislative Decree no. 231 of 8 June 2001 (hereinafter also referred to as the 'Decree'), which introduced the administrative liability of entities into the Italian legal system.

CSP is, moreover, aware that the adoption of a Code of Ethics, which clearly and transparently sets out the set of values by which it is inspired in achieving its *business* objectives, is of central importance for the correct performance of its activities. The Code also constitutes an element of support for the Organisation, Management and Control Model that the Company is called upon to adopt, pursuant to and for the purposes of the Decree, for the prevention of the offences provided for in the Decree.

That being said, this document (hereinafter alternatively the '**Code of Ethics**' or more simply the '**Code**'), adopted by the Board of Directors, sets out the principles and ethical values to which CSP adheres in the performance of its activities, and which it expects the strictest compliance with by all the subjects present in the company and, more generally, by all those who cooperate and collaborate with it in the pursuit of its corporate mission.

All employees and those who cooperate in the performance of the Company's activities are required to be familiar with the Code of Ethics, contributing, as far as each one is concerned, to its observance. To this end, the Company, to the extent of its competence, undertakes to guarantee the widest possible dissemination of the Code of Ethics, ensuring an adequate training and awareness programme on its contents.

The Company, also through the control body (hereinafter referred to as the 'Supervisory Board') established pursuant to the Decree, monitors compliance with the rules of conduct contained in this Code of Ethics.

### **1. SCOPE AND ADDRESSEES**

CSP imprints the principles of this Code of Ethics, identified below, on all actions, operations, relationships and transactions carried out in the management of its various corporate activities.

This Code of Ethics contains the inspiring principles of CSP and binds those who hold representative, administrative or managerial positions, or who exercise, even de facto, the management and control of the Company, or who cooperate and collaborate with it, for any reason, in the pursuit of its business objectives, all employees without exception, collaborators (including, by way of example, consultants, agents, representatives, intermediaries, etc.) and anyone who has business relations with the Company (hereinafter referred to as the 'Addressees').

The Addressees must be familiar with the provisions of this Code of Ethics, and Company employees are also called upon to actively contribute to its scrupulous observance.

In particular, the directors of CSP are required to be inspired by the principles of the Code of Ethics, when setting the company's objectives, proposing investments and implementing projects, and in any decision or action relating to the management of the companies. Similarly, the managers and heads of company functions, in concretely implementing the Company's management activities, must be inspired by the same principles, both internally, thereby strengthening cohesion and the spirit of mutual collaboration, and externally, towards third parties with whom CSP enters into relations.

To this end, this Code of Ethics will also be brought to the attention of collaborators, business partners in business relations, as well as anyone who has business relations with the company. CSP therefore undertakes to ensure the widest possible dissemination of this Code of Ethics, also through the use of suitable cognitive, training and awareness tools regarding its contents.

## **2. OBLIGATIONS OF EMPLOYEES AND COLLABORATORS**

The employees of the Company perform their duties in accordance with the principles of honesty, fairness, commitment and professional rigour, and act, in the performance of the activities entrusted to them, in compliance with the provisions of the law.

Every action, operation, negotiation and, more generally, any activity carried out by the Company's employees must comply with the rules of fair management, transparency, completeness and truthfulness of information, as well as with corporate procedures.

The criteria of cooperation, loyalty and mutual respect must govern relations between employees at all levels, and between them and third parties with whom they come into contact as a result of their work activities.

In particular, employees are obliged to:

- diligently observe the provisions of the Code of Ethics, refraining from any conduct contrary to them;
- report to the Supervisory Board any information concerning alleged violations of the this Code of Ethics occurred within the company;
- offer the utmost cooperation in investigating possible and/or alleged violations of this Code of Ethics;
- inform third parties who enter into relations with the Company of the provisions of the Code of Ethics and request their compliance.

The Company's collaborators (including, but not limited to, consultants, agents, representatives, intermediaries, etc.) and anyone who has business relations with the Company are also required to abide by the principles contained in the Code of Ethics.

CSP undertakes to disseminate the Code of Ethics as widely as possible, also by displaying it on notice boards accessible to all personnel and publishing it on the Company's website, and to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to any violations that may occur, and in any case in accordance with the provisions in force governing labour relations.

### **3. GENERAL PROVISIONS**

#### **3.1 Ethical Principles**

In order to achieve its objectives, the Company complies with the following principles (hereinafter also referred to as the 'Principles'):

- compliance with the laws and regulations in force in all the countries in which the Group Companies operate and observance of the strictest rules of conduct, particularly in relations with the Public Administration;
- equality and impartiality in the treatment of employees, collaborators and customers;
- transparency and reliability;
- honesty, fairness and good faith;
- confidentiality;
- value of the person and human resources.

The Principles, which must inspire the Company's activities and guide the conduct of the Addressees, are further specified below.

##### **3.1.1 Observance of laws and respect for rules of behaviour**

The conduct of the Addressees, in the activities carried out in the interest of the Company, is inspired by honesty and legitimacy, in accordance with the rules in force.

##### **3.1.2 Equality and impartiality**

In the management of the various corporate activities and in all related decisions (including, by way of example, the choice of customers, personnel management and work organisation, the selection and management of suppliers, relations with the community and the institutions representing it, etc.), the Addressees must operate impartially in the best interests of the Company, taking decisions with professional rigour and impartiality, according to objective and neutral assessment criteria.

##### **3.1.3 Transparency and reliability**

In the performance of their work or professional activities, the actions, operations, negotiations and, more generally, the conduct of the Addressees shall be inspired by the utmost transparency and reliability.

In the management of social activities, Addressees are required to provide transparent, truthful, complete and accurate information.

CSP promotes and disseminates, at every level of the company, the culture of control, making its employees aware of the importance of the system of internal controls and compliance, in the performance of work activities, with current regulations and company procedures.

The Company, through the appropriate company contact persons, cooperates with the Statutory Auditors and the Auditing Company in the performance of their duties.

#### **3.1.4 Honesty, fairness and good faith**

The Addressees, in the context of the most diverse relations established with the Company, shall refrain from carrying out activities that are contrary to the Company's interest, in the knowledge that the pursuit of the Company's interest can in no way justify conduct contrary to the principles of the Code of Ethics.

In the conduct of activities, situations where the persons involved in the transactions are or may be in conflict of interest must absolutely be avoided, where a conflict of interest is understood to mean a situation in which the Addressee pursues an interest other than that of CSP or carries out activities that may, in any case, interfere with his or her ability to make decisions in the exclusive interest of the Company, or personally takes advantage of business opportunities of the Company.

In the event of a conflict of interest, the Addressees shall inform their manager or company contact person without delay, complying with the decisions to be taken in this regard by the Company.

The Company, aware that a healthy and correct system of competition contributes to the best development of its corporate mission, scrupulously observes the regulations in force concerning competition and refrains from carrying out and/or encouraging behaviour that may integrate forms of unfair competition.

All the Company's activities must be conducted with the utmost commitment, diligence and professionalism in a spirit of mutual respect and cooperation.

The Addressees are called upon to perform their activities with a commitment appropriate to the responsibilities entrusted to them, protecting the image and reputation of the Company.

#### **3.1.5 Confidentiality**

CSP recognises confidentiality as a fundamental and necessary rule of all conduct. The Company therefore ensures the confidentiality of the information in its possession and refrains from using confidential data, except in the case of express and conscious authorisation and, in any case, always in the strictest compliance with current privacy legislation.

In the context of the various relations with the Company and its interlocutors, Addressees must refrain from using confidential and non-public information, of which they have become aware by reason of their office and/or profession, for personal purposes and, in any case, not connected with the exercise of the working or professional activity entrusted to them or carried out in the interest of the Company.

No employee or collaborator may derive any advantage of any kind, direct or indirect, personal or financial, from the use of confidential information, nor may he or she communicate such information to others or recommend or induce others to use it.

Disclosure of information to third parties must be made exclusively by authorised persons and in any case in accordance with company regulations.

CSP applies and continuously updates policies and procedures for the protection of information.

### ***3.2 Correctness and transparency of corporate information***

Every action, operation or transaction must be correctly recorded in the company's accounting system in accordance with the criteria indicated by law and the applicable accounting principles, and must also be duly authorised, verifiable, legitimate, consistent and congruous.

In order for the accounts to meet the requirements of truthfulness, completeness and transparency of the recorded data, adequate and complete supporting documentation of the activity performed must be kept on file for each transaction:

- accurate accounting records;
- the immediate identification of the characteristics and motives underlying the transaction;
- the easy formal and chronological reconstruction of the transaction;
- the verification of the decision-making, authorisation and implementation process, and the identification of the various levels of responsibility.

Each employee and collaborator shall, to the extent of his or her competence, ensure that any facts relating to the management of the Company are correctly and promptly recorded in the Company's accounts.

Each accounting entry must accurately reflect the findings of the supporting documentation. Therefore, it shall be the duty of each employee and collaborator assigned to this task to ensure that the supporting documentation is easily retrievable and ordered according to logical criteria.

CSP promotes and disseminates, at all company levels, the culture of control, making its employees aware of the importance of the system of internal controls and compliance, in the performance of work activities, with current regulations and company procedures, in order to

- ascertain the adequacy of the various business processes in terms of efficiency, effectiveness and cost-effectiveness;
- ensure the reliability and correctness of accounting records and the safeguarding of company assets;
- ensure compliance of accounting and tax compliance with current legislation and the Group's internal directives;
- ensure proper disclosure to the financial market.

Internal control systems comprise the set of control activities that individual corporate functions perform on their processes in order to protect corporate assets, effectively manage corporate activities and provide clear information on the Company's financial, economic and asset situation, as well as all those activities aimed at identifying and containing corporate risks.

Employees and collaborators are obliged, to the extent of their competence:

- to cooperate actively in the proper and effective functioning of the internal control system;
- to responsibly safeguard company assets, whether tangible or intangible, instrumental to their activity and not to misuse them.

### ***3.3 Anti-Money Laundering***

The Addressees, in the context of the various relations established with the Company, must not, in any way and under any circumstances, be implicated in events connected with the laundering of money deriving from illegal or criminal activities.

Before establishing relations or entering into contracts with non-occasional suppliers and other partners in business relations, the Company and its employees and/or collaborators shall ensure the moral integrity, reputation and good name of the counterparty.

CSP is committed to complying with all national and international anti-money laundering rules and regulations.

### ***3.4 Protection of Industrial and Intellectual Property***

In implementation of the principle of compliance with the law, the Group ensures compliance with internal, EU and international regulations on the protection of industrial and intellectual property.

The Addressees shall promote the correct use, for any purpose and in any form, of trademarks, distinctive signs and all intellectual works of a creative nature, including computer programs and databases, to protect the author's patrimonial and moral rights.

To this end, it is forbidden to engage in any conduct aimed, in general, at counterfeiting, altering, duplicating, reproducing or disseminating, in any form whatsoever and without right, the work of others.

### ***3.5 Respect for and protection of the environment***

CSP considers the protection of the environment and the sustainable development of the area in which it operates to be of primary importance, in consideration of the rights of the community and future generations.

CSP is committed, and requires a similar commitment from the Group companies it heads, to consider, in its operational management and business initiatives, the unavoidable environmental needs and to minimise the negative impact that its business activities have on the environment.

To this end, the Company, in full compliance with current environmental legislation, pays particular attention to the following aspects:



- promotion of activities and processes that are as environmentally friendly as possible, through the use of advanced criteria and technologies on environmental protection, energy efficiency and sustainable use of resources;
- assessing the environmental impacts of all company activities and processes;
- collaboration with *stakeholders*, both internal (e.g. employees) and external (e.g. institutions), to optimise the management of environmental issues;
- pursuit of environmental p r o t e c t i o n standards through the implementation of appropriate management and monitoring systems.

### **3.6 Tax and customs compliance management**

The Company guarantees the correctness of every accounting transaction and every declaration for tax and customs purposes.

The Addressees shall promote the completeness, clarity and accuracy of the data and information processed, compliance with the principles of compiling accounting documents, the punctual correspondence between tax documents and the relevant transactions, the punctual correspondence between customs documents and the relevant transactions, and the correctness and truthfulness of tax and customs declarations.

Third parties, who in any capacity interface with the Company in the management of tax and customs fulfilments, guarantee adequate cooperation with the corporate functions in charge of achieving the corporate purposes in the relevant activities, in compliance with the principles set out.

## **4. INTERNAL RELATIONS**

CSP protects and promotes the supreme value of the human person who must not be discriminated against on the basis of age, gender, sexual orientation, race, language, nationality, political and trade union opinions, religious beliefs.

CSP recognises the centrality of human resources in the conviction that the most important factor in the success of any company is guaranteed by the professional contribution of the people who work in it, in an environment of loyalty and mutual trust. For CSP, human resources represent an indispensable and precious value for its very existence and future development.

CSP recognises as essential principles of its corporate philosophy, in line with the international organisation to which it belongs, respect for work, the professional contribution and commitment of each individual, respect for different opinions, regardless of seniority and experience, and the strength of ideas.

In this r e s p e c t, CSP ensures equal opportunities at every level of the organisation, according to criteria of merit and without any discrimination.

Employees and collaborators are, on the other hand, required to commit themselves and act loyally by ensuring the services they are due and the commitments they have undertaken towards the Company.

CSP also undertakes to ensure that authority is exercised fairly and correctly, avoiding any abuse. In particular, authority must never become an exercise of power detrimental to the

dignity and autonomy of employees and collaborators in a broad sense. Choices

of work organisation must safeguard the value of employees and collaborators.

CSP guarantees the physical and moral integrity of its employees and collaborators, working conditions that respect individual dignity and a safe and healthy working environment. In no way are requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behaviour detrimental to the moral and personal convictions and preferences of each person tolerated.

Aware, moreover, that professionalism is a value that is acquired through practice and experience and specific training, CSP recognises the decisive contribution that this process receives from senior professionals and promotes the transfer of their knowledge and professional attitude to younger staff.

CSP pursues the enhancement of professionalism, promotes individuals' aspirations, learning expectations and professional and personal growth.

#### **4.1 *Discrimination and harassment***

CSP does not tolerate any discriminatory conduct or any form of harassment and/or personal or sexual offence. CSP is therefore committed to fostering a working environment that excludes any form of discrimination and harassment related to race, sex, religion, nationality, age, sexual orientation, disability or other personal characteristics not related to work.

#### **4.2 *Prohibited behaviour at work***

In the workplace, any illegal conduct or any form of abuse, threat or aggression against persons or company property is strictly forbidden. Personnel are required to report any conduct of this nature and, in any case, any alleged breach of rules, directives or procedures, to their supervisor, who will report, with the appropriate guarantees of confidentiality, to the Human Resources function, which, after carrying out the necessary checks and assessments, will perform a consultative function vis-à-vis the Board of Directors, providing an opinion on the measures to be taken.

#### **4.3 *Safety and Health at Work***

In view of its *core business*, the Company guarantees working conditions that respect individual dignity and ensure safe and healthy working environments, in compliance with current accident prevention and occupational health and hygiene regulations.

CSP firmly promotes the dissemination of a culture of safety and awareness of the risks associated with the work activities carried out, requiring everyone, at every level, to behave responsibly and in compliance with the safety system set up and all the company procedures that form an integral part of it.

With this in mind, every employee, collaborator and whoever in various capacities works in the Company's offices and plants is called upon to personally contribute to maintaining the safety and quality of the working environment in which he or she operates, scrupulously complying with the safety system set up and all company procedures that form part of it.

CSP commits itself:

- to carry out safe activities in order to protect the health of the company's employees and the communities where it is based, aligning its operational strategies with the company's policy on safety, health and the environment;
- guaranteeing the training and information of all those who work in the offices and plants belonging to the Company, on the safety risks to which they are exposed from time to time, ensuring that they are provided with the means and Individual Protection Devices required by current legislation in relation to the type of activity carried out;
- to periodically review and continually monitor the performance and efficiency of its system to guard against safety-related risks, to maintain safe workplaces to protect the integrity of its personnel, and to achieve the continuous improvement targets set by CSP on safety, health and environment.

## **5. RELATIONS WITH THIRD PARTIES**

CSP is particularly careful to develop a relationship of trust with all its possible interlocutors, i.e. individuals, groups or institutions whose contribution is necessary to pursue its corporate mission, as well as with collaborators, customers, suppliers, business partners, public institutions, the market, political, trade union and social organisations, whose interests may be, directly or indirectly, influenced by the Company's activities.

In carrying out its activities, the Company adheres to the principles of loyalty and fairness, requiring honest, transparent and law-abiding conduct from all those working on its behalf in any relationship they enter into, and not tolerating corrupt and/or collusive conduct or undue favouritism.

CSP, aware of the relevance of the services rendered, ensures the transparency of its actions and conduct.

It is forbidden for employees and collaborators to give, offer, accept or receive gifts, benefits and/or any other utility, personal or otherwise, in the context of the activities carried out for the Company, except for the granting of gifts of modest value on the occasion of events (e.g. press meetings), Christmas festivities, or other initiatives implemented by the Company in its commercial, marketing and communication strategies.

The handling of gifts by employees of the Company must be limited to the cases provided for and must not in any way give rise to even the suspicion of having acted in the interest of and on behalf of the Company.

### *5.1 Customer relations*

In line with its fundamental values and aware that each customer has different needs and expectations and that each one represents, in any case, an opportunity for growth, the Company bases its relations with all its customers on the principles of integrity, honesty, fairness, respect and mutual trust, as well as professionalism, independence and fairness.

## **5.2 Relations with Suppliers**

Similarly, the Company manages relations with suppliers with loyalty, fairness and professionalism, encouraging ongoing collaboration and solid, long-lasting relationships of trust.

The selection of suppliers and the determination of the conditions for the purchase of goods and services are made on the basis of objective and impartial assessments based on quality, price and guarantees provided.

The Company shall observe the following principles in its relations with its suppliers:

- the Company neither practices nor approves any form of 'reciprocity' with suppliers: the goods/services the Company seeks are selected and purchased solely on the basis of their value in terms of price and quality;
- any negotiations with an actual or potential supplier must relate exclusively to the goods and services being negotiated with the supplier;
- the personnel in charge of purchasing goods and services must not be subject to any form of pressure from suppliers to donate materials, products and/or sums of money to charity/solidarity associations or similar.

The undertaking of commitments and the management of relations with current and potential suppliers must be carried out in compliance with the Company's guidelines on conflict of interest and business management.

## **5.3 Relations with Public Institutions**

Relations with public, national, community and/or international institutions, as well as with public officials or persons in charge of a public service, i.e. bodies, representatives, agents, exponents, members, employees, consultants, persons in charge of public functions, Public Institutions, Supervisory Authorities and/or other Independent Administrative Authorities, must be characterised by the strictest compliance with the laws in force; these relations are exclusively entrusted to the persons authorised to do so on the basis of the current delegations and proxies conferred by the Company's administrative body. CSP bases its relations with the Judicial Authority and Public Authorities in general on the principles of correctness, completeness and truthfulness.

CSP undertakes to maintain an attitude of maximum cooperation, transparency and fairness towards the above-mentioned subjects with whom it has relations in any capacity.

## **5.4 Relations with the Public Administration**

Relations with public officials in charge of a public service and with public and/or private entities providing public services (hereinafter generically referred to as the Public Administration) and, in any case, any relationship of a public nature, must always be inspired by the strictest compliance with the applicable provisions of law, the principles of transparency, honesty and fairness, and may in no way compromise the integrity and reputation of the Company.

The management of relations with the Public Administration or relations that are in any case of a public nature, are reserved exclusively to the company functions appointed and authorised for that purpose.

In its relations with the Public Administration, the Company must not improperly influence the decisions of the Administrations concerned, in particular of the officials dealing with or making decisions on their behalf.

During negotiations or business relations, including commercial ones, with the Public Administration, in Italy or in other countries, the Company shall refrain from conduct contrary to the principles set out above, including but not limited to

- offer or grant employment opportunities and/or commercial advantages to Public Administration personnel involved in the negotiation or relationship, or to their family members;
- offering or receiving gifts or other benefits, unless they are acts of commercial courtesy of modest value;
- provide untruthful information or omit to communicate relevant facts, where requested by the Public Administration.

In relations with the Public Administration, in Italy and abroad, it is not permitted for the Company's representatives and/or employees to pay or offer, directly or through third parties, sums of money or other benefits of any kind and entity, whether they be public officials, government representatives, public employees or private individuals, to compensate or repay them for an act of their office, or to achieve or delay the performance of an act contrary to the duties of their office.

#### **5.5 *Managing relations with the Independent Administrative Authorities***

CSP undertakes to scrupulously observe the rules dictated by the Public Supervisory Authorities (e.g.: Competition and Market Authority, Personal Data Protection Authority, etc.) for compliance with the regulations in force in the sectors connected with its activity.

The Addressees undertake to comply with any request that may be made by the Independent Administrative Authorities in the exercise of their functions and to provide full cooperation during investigative procedures.

To ensure maximum transparency, CSP undertakes not to find itself in situations of conflict of interest with officials/employees of Independent Administrative Authorities or their relatives.

In relations with these authorities, no form of gift is permitted that is in any way aimed at acquiring favourable treatment in the conduct of any of the activities in any way connected with CSP. This rule concerns both gifts promised or offered and those received, whereby gift means any kind of benefit.

#### **5.6 *Managing relations with other stakeholders***

The Company's relations with private entities, such as NPOs and other non-profit organisations, must be inspired by the strictest compliance with the applicable legal provisions and may in no way compromise the integrity and reputation of CSP.

The assumption of commitments and the management of relations, of any kind, with private entities, are reserved exclusively for the company departments appointed for this purpose and the personnel authorised to do so in accordance with the system of delegated powers, job descriptions and company procedures.

## 5.7 *Relations with trade unions and social organisations*

CSP contributes to the economic well-being and growth of the communities in which it operates. To this end, in carrying out its activities, it is guided by respect for local and national communities, favouring dialogue with trade unions and other associations.

CSP encourages and supports social, sporting, humanitarian and cultural initiatives, possibly also through the disbursement of contributions in favour of foundations, institutions, organisations or entities dedicated to carrying out social, cultural and, more generally, activities aimed at improving living conditions and spreading a culture of peace and solidarity. The process of disbursing such contributions must comply with the applicable regulations and be correctly and adequately documented.

CSP does not promote or entertain any kind of relationship with organisations, associations or movements that pursue, directly or indirectly, criminal purposes or, in any case, purposes prohibited by law.

CSP also condemns any form of participation of the Addressees in associations whose purposes are prohibited by law and contrary to public order and repudiates any conduct aimed even only at facilitating the activity or programme of organisations instrumental to the commission of offences, even if such facilitating conduct is necessary to obtain a benefit.

## 5.8 *External Communications*

Any communication to the outside world of documents and information concerning the Company or other parties with which it has relations must comply with the laws, regulations and professional conduct practices in force. It is, in any case, forbidden:

- the disclosure of any '*price sensitive*' information acquired in the course of the company's activities;
- the disclosure of false or tendentious news concerning CSP or other persons with whom the Company has relations in the performance of its activities;
- any form of pressure aimed at acquiring favourable attitudes on the part of the media/public information bodies.

In order to ensure completeness and consistency of information, the Company's relations with the *mass media* are reserved exclusively for the relevant functions.

The contents of product information must always be documented or documentable. Exaggerated statements, universal and hyperbolic assertions, and unprovable comparisons without a clear objective basis are not permitted. CSP puts its promoters in a position to provide the (health) operator with that information on the properties and characteristics of the product that enables it to be used correctly.

In the context of product information and promotion activities, texts, tables and other illustrations taken from medical journals or scientific works must be reproduced in full and faithfully, with the exact indication of the source. Quotations which, divorced from the context from which they are taken, may be partial and/or contradict the author's intentions are not permitted.

## **6. FINAL PROVISIONS**

### **6.1 Violations and sanctions consequences**

All employees and collaborators, in the event that they become aware of alleged violations of this Code of Ethics or of conduct that does not comply with the rules of conduct adopted by CSP, must immediately inform the bodies set up for this purpose on the basis of the regulations in force. These bodies will, in fact, proceed to verify the legitimacy of the alleged violations, hearing, if necessary, the person who made the report and/or the alleged perpetrator.

Such reports may also be made anonymously.

However, CSP recommends that they be nominative, in order to allow the parties in charge to carry out a more efficient investigation, applying in any case the safeguards provided for.

The Report, even if anonymous, must be documented and circumstantiated, so as to provide the useful and appropriate elements to allow an appropriate verification activity on the merits of the reported facts. It is particularly important that it includes, where such elements are known to the Reporting Party:

- a detailed description of the facts that occurred and how they became known;
- date and place where the event occurred;
- names and roles of the persons involved or elements that might enable them identification;
- names of any other persons who may report on the facts that are the subject of the Report;
- reference to any documents that may confirm the accuracy of the reported facts.

The person in charge of receiving and examining the Report is the Supervisory Board (SB) of CSP.

The Whistleblowing Report, following the entry into force of the regulatory update Legislative Decree 24/2023 on whistleblowing, must be sent, in English or in the local language, in the following manner: access the CSP whistleblowing platform at the following address:

<https://cspinternational.segnalazioni.net> following the instructions:

<https://manuali.digitalpa.it/whistleblowing/v4-0-0/frontend/manuale-operational-user-not-registered.html>

It is understood that, when verifying whether the Report received is well-founded, anyone who has made it may be contacted to request any further information that may be necessary.

Compliance with the provisions of this Code of Ethics must be considered an essential part of employees' contractual obligations pursuant to and for the purposes of Article 2104 of the Civil Code. Any breach of the provisions of the Code of Ethics may constitute a breach of the obligations of the employment relationship and/or a disciplinary offence, in accordance with the procedures



provided for in Article 7 of the Workers' Statute and in the applicable collective bargaining agreement, with all legal consequences, also with regard to the preservation of the employment relationship, and may entail the payment of damages arising therefrom.

## **6.2 *Approval of the Code of Ethics and its amendments***

The Code of Ethics (Version 00) was approved by the CSP Board of Directors on 17 February 2014. An update of the Code of Ethics (Version 01) was made on 12 March 2021. The present version of the Code of Ethics (Version 02) was made on 30 June 2023.

Any amendments and/or updates thereof shall be approved by the same body and promptly communicated to the Addressees.