



## **ETHICAL CODE**

The Revision n-3 of the Code of Ethics of SAPONIFICIO RONDINELLA SRL below exposed was approved by the General Director of SAPONIFICIO RONDINELLA SRL on **23<sup>rd</sup> Jan 2026**

### ***Preamble***

The Code of Ethics of SAPONIFICIO RONDINELLA SRL identifies the primary business values which the company intends to comply in its current operations, without prejudice to the typically lucrative purposes that characterize its legal type.

The adoption of the Code of Ethics is an expression of a precise company choice and is a manifestation of the Company's sensitivity to the need to ensure compliance with the law and conditions of fairness and transparency in the conduct of business or carrying out corporate activities, including through the widest possible dissemination and to disclose the Code of Ethics of the SRL SAPONIFICIO RONDINELLA at anyone coming into contact with the Company.

Everyone working in SAPONIFICIO RONDINELLA SRL or with the Company, without distinction or exception, must commit themselves to observe and to ensure compliance with these standards as part of their duties and responsibilities. Under no circumstances can the conviction of acting for the benefit or in the interest of the SRL SAPONIFICIO RONDINELLA can justify the adoption of behaviors in contrast with these principles.

### ***Art.1 – Applicability and compliance with the Code of Ethics***

**1.1** Are defined as **recipients** all the subjects covered by the Code of Ethics, namely:

- a) All employees of the SRL SAPONIFICIO RONDINELLA, including fixed-term or part-time workers and workers in these assimilated (the "Employees");
- b) All those who, directly or indirectly, permanently or temporarily, establish relations with SAPONIFICIO RONDINELLA SRL and relationships or otherwise act to achieve its objectives, in all countries where the SAPONIFICIO RONDINELLA SRL operates (the "Collaborators" and "Customer");  
All those who, permanently or temporarily, lend under any form of goods and/or services with SAPONIFICIO RONDINELLA SRL ("Suppliers").

**1.2** All recipients must be aware of the Code of Ethics, to comply with its provisions and in relations with each other (internal relations), and in relations with third parties (external relations), to actively contribute to its implementation and report any deficiencies to Direction.

For non-employees, compliance with the Code is a condition for the continuation of the professional or collaborative relationship in place with SAPONIFICIO RONDINELLA SRL.

### ***Art.2 – General Principles***

- SAPONIFICIO RONDINELLA SRL aims to orientate the behavior and relationships, both internal and external, to the fundamental values indicated below:
- **Legality, honesty and fairness:** SAPONIFICIO RONDINELLA SRL operates in compliance with current laws, regulations, rules and procedures and this Code. Under no circumstances may the pursuit of SAPONIFICIO RONDINELLA SRL justify conduct contrary to the principles of fairness and legality. SAPONIFICIO RONDINELLA SRL is committed, as part of its organization, for the diffusion and knowledge of the Code of Ethics;
- **Integrity:** in relations with employees and with third parties SAPONIFICIO RONDINELLA SRL is committed to acting fairly and transparently, avoiding misleading information and behavior designed to take undue advantage from positions of disadvantage of third parties;
- **Loyalty and good faith:** relations with employees and third parties must be based on good faith and reliability, and to the maintenance of the agreements, the promises, the covenants, the valuations of assets and the pursuit of behavior in good faith in every decision;



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- **Security, protection of health and working conditions:** The physical and moral integrity of its employees and each operator is considered a primary value of SRL SAPONIFICIO RONDINELLA. safety, hygiene and health is protected in the workplace and is considered essential and a priority in the conduct of its activities, the full respect of health, physical integrity and the full compliance with current legislation safety, hygiene and health at work;
- **Respect for people and equal opportunities:** SAPONIFICIO RONDINELLA SRL respects the fundamental rights of the people and guarantees everyone equal opportunities;
- **Professionalism and development of human resources:** SAPONIFICIO RONDINELLA SRL recognizes the centrality of human resources and protects and promotes the value, in order to improve and increase the wealth and competitiveness of the skills possessed by each, following a policy based on recognition of merit and equal opportunities for acquiring Increased capacity;
- **Environment:** It promotes respect and protect the environment, actively committed to ensuring full compliance with current environmental regulations in the conduct of business activities.
- **Confidentiality:** SAPONIFICIO RONDINELLA SRL guarantees the confidentiality of the information in its possession and refrains from collecting and using sensitive data, except in case of express and informed consent of the data subject and in any case in accordance with the applicable laws;

### Art.3 – Commitments SAPONIFICIO RONDINELLA SRL

The Company commits to ensure:

- The widest possible dissemination of the Code and its effective application.
- The update of the Code of Ethics in order to meet the evolving civil sensibility, the business environment and of regulations relevant for the same; checks on any notice of violation of the Code of Ethics;
- The assessment of the facts and the subsequent implementation, in case of ascertained violation, of appropriate sanctions;

### Art. 4 – Internal rules of conduct

#### 4.1 Duties of Employees

To each employee is required to know the rules contained in the Code of Ethics and of the relevant regulations governing the activities carried out as part of its function. The SAPONIFICIO RONDINELLA SRL Employees are required to:

- Refrain from conduct contrary to such rules;
- In case of need contact the Direction for clarification on the application of the same
- Promptly report to the management directly or through anonymous reporting in a special box (see Att. A – Reporting Code of Ethics Violations Form), about possible violations.

#### 4.2 Business management in general

DESKIN SRL in business relations is guided by the principles of loyalty, fairness, transparency, efficiency and openness to the market and operates in compliance with the Anti-Trust legislation.

#### 4.3 Gifts, tenders and other benefits

In relations with customers, suppliers and third parties in general, tenders or concessions are not allowed, either directly or indirectly, money, gifts or benefits of any personally nature aimed at obtaining undue advantages - real or apparent - of any kind (e.g. the promises of economic advantages, favors, recommendations, promises of job offers, etc.) or in any case aimed at acquiring or reserve favorable treatment in any activity related to the Company.

Acts of kindness are allowed, provided they are of modest value and made in compliance with any relevant legislation, and should be managed in accordance with proper corporate policy.



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### **4.4 Conflict of interest**

Targets must avoid situations and/or activities which can lead to conflicts of interests with those of SAPONIFICIO RONDINELLA SRL or that could interfere with their ability to make impartial decisions, in safeguarding the best interests of the same.

By way of example conflict of interest exists if:

- Use of information obtained in carrying out work activities for the benefit of third parties and otherwise contrary to those of SAPONIFICIO RONDINELLA SRL;
- Assumption of social charges or working activities of any kind and also indirectly, with customers, suppliers, competitors and third parties in general contrary to the interests of SAPONIFICIO RONDINELLA SRL.

### **4.5 Selection and contractual relationships with suppliers**

The selection of suppliers and formulation of the conditions of purchase of goods and services for SAPONIFICIO RONDINELLA SRL is guided by respect for the values of competition, objectivity, fairness, impartiality, fair price, quality of goods and/or service, evaluating the offerings views

Procurement processes must be based on the maximum competitive advantage for SAPONIFICIO RONDINELLA SRL and the fairness and impartiality towards each Supplier in possession of the requirements. It should also be pursued collaboration of Suppliers in constantly meeting the needs of SAPONIFICIO RONDINELLA SRL's customers in terms of quality and delivery times. Suppliers engage themselves to operate in compliance with current laws on workers rights, on safety, hygiene and health on work place.

### **4.6 Protection of personal data - (Privacy)**

SAPONIFICIO RONDINELLA SRL, in carrying out its activities, in order to ensure the protection of personal data, agrees to process them in accordance with local regulations.

### **4.7. Artificial Intelligence**

SAPONIFICIO RONDINELLA is committed to using Artificial Intelligence in compliance with applicable laws and regulations, both with regard to the prohibitions imposed by individual laws and with regard to the opportunities recognized by those laws.

The use of Artificial Intelligence must also be inspired by human principles and values so as not to support immoral purposes, such as, but not limited to, illegal and discriminatory intent.

### **4.8 Use of corporate assets**

Each Recipient is responsible for the protection and proper use of SAPONIFICIO RONDINELLA SRL assets, tangible and intangible, including confidential information and computing resources and network, and has a duty to inform the Direction of any threats or damaging events for SAPONIFICIO RONDINELLA SRL.

In particular, each recipient must:

- Work diligently to protect corporate assets by acting responsibly;
- Avoid improper use of company assets for purposes contrary to the law, public order or morality, as well as to commit or cause the commission of crimes and / or racial intolerance, exaltation of violence or violation of human rights;
- Obtaining approval of the Direction in case of use of the asset outside the company.

### **4.9 Traceability and transparency of accounts**

SAPONIFICIO RONDINELLA SRL is aware of the importance of truth, transparency, accuracy, completeness and regulatory compliance of accounting information.

In particular:

- Accounting transparency is based on the truthfulness, accuracy, completeness and reliability of the documentation of management and related accounting entries.



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- Each Recipient shall cooperate to ensure that operating events are represented correctly and promptly in the accounts.
- It is kept on record, for each operation, adequate supporting evidence, to allow easy accounting entry.
- Each record shall reflect exactly what is shown by the supporting evidence.

### **4.10 Travel and entertainment**

The travel and entertainment must be compatible with the demands of work. Intent of SAPONIFICIO RONDINELLA SRL is to ensure that Employees and, more generally Recipients do not obtain unjustified or illegitimate advantages nor suffer damage or economic loss as a result of carrying travel or business entertainment. They are therefore required to use the money of SAPONIFICIO RONDINELLA SRL and to handle it with the same care and caution with which they would spend their own. When an expense is presented, it will be reimbursed reasonable expenses, effective and authorized by the Direction.

### **4.11 Confidential information**

The documents and confidential information of SAPONIFICIO RONDINELLA SRL (including projects, proposals, strategies, negotiations, understandings, commitments, agreements, contracts being finalized, products not yet placed on the market, research results, financial projections and customer lists), They may be disclosed only by the direction or with the permission of the same. Confidential information obtained as a recipient cannot be used for the personal benefit of Employees or Recipients or other entities associated with them or related.

## **Art.5 – External relations**

### **5.1 Parties, trade unions and associations**

Relations with political parties, trade unions and other interest groups are handled by Management with particular regard to the principles of impartiality and independence.

SAPONIFICIO RONDINELLA SRL. It does not make direct or indirect contributions to political parties or to their representatives or candidates, and shall refrain from any direct or indirect pressure from politicians (for example, through acceptance of reports for recruitment, consultancy contracts, etc.).

Each employee must acknowledge that any form of involvement in political activities occurs on a personal basis, on their own time, at their own expense and in accordance with the laws in force.

### **5.2 Public administration**

SAPONIFICIO RONDINELLA SRL in relations with the P.A. observe the following principles:

- Adjust their conduct by maximum transparency, clarity, fairness and impartiality so as not to lead to partial interpretations, false, ambiguous or misleading any institutional audience with whom are maintained relationships for various reasons;
- Relations with the P.A., Italian or foreign, for business negotiations or other contacts of any kind to the company's business, are managed solely by the Direction;
- Prohibits the promise and / or offer of any object, service, value performance for a more favorable treatment in relation to any dealings with P.A., Italian or foreign;
- Restrict allocated to purposes other than those for which they were awarded grants, subsidies or loans obtained from the State or other public body or by the European Community also of low value and/or amount.



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### **5.3 Relations with the media**

The communication to the media plays an important role in enhancing the image of SAPONIFICIO RONDINELLA SRL. Therefore the relations between DESKIN SRL and the mass media is entitled only to the management or to persons authorized by the same. The information to the exterior is inspired by criteria of truth and transparency. It is absolutely forbidden to divulge false information.

In general, SAPONIFICIO RONDINELLA SRL Employees may not provide information to representatives of the media nor undertake to provide it without the permission of the management.

### **5.4 Clients**

Is the primary goal of SAPONIFICIO RONDINELLA SRL the full satisfaction of its customers through reliable behavior, correct and designed to ensure high quality products and service. SAPONIFICIO RONDINELLA SRL imposes contracts and relationships with customers fairly, fully and transparently, in accordance with the law.

Even where the occurrence of events or situations, SAPONIFICIO RONDINELLA SRL meets customer expectations, executing contracts with fairness, without exploiting any weakness or ignorance to the emergence of unanticipated events.

In relations with customers, Recipients must not offer or accept gifts or other form of benefits and/ or benefits that could be interpreted as a means of obtaining favorable treatment for any activity connected to SAPONIFICIO RONDINELLA SRL and are not attributable to normal trade relations or courtesy.

## **Art.6 – Staff Policy**

### **6.1 Human resource management**

Human resources are an indispensable element for the Company existence. The dedication and professionalism of the employees are decisive values and conditions for the success of the same.

SAPONIFICIO RONDINELLA SRL is committed to respecting the work-life balance of its employees, including through corporate welfare, aware that it is an essential lever for the well-being and quality of working life of each of them.

SAPONIFICIO RONDINELLA SRL is committed to developing skills and competencies of each employee so that the energy and creativity of individuals is fully expressed in the achievement of objectives for SAPONIFICIO RONDINELLA SRL.

SAPONIFICIO RONDINELLA SRL offers all employees the same opportunities for training and professional growth, making sure that everyone can enjoy equal treatment based on merit, without any discrimination.

SAPONIFICIO RONDINELLA SRL therefore opposes any discriminatory or harmful behavior or attitude of the person, their beliefs and preferences, set up by any employee with respect to colleagues, superiors or subordinates. Any violation of the provisions of this Article shall be immediately submitted to the Directorate.

### **6.2 Safety and Environment**

DESKIN SRL undertakes to spread and consolidate a culture of safety, developing risk awareness and promoting responsible behavior by all employees and working to preserve, mainly through preventive actions, the health and safety of workers.

The SAPONIFICIO RONDINELLA SRL activities must take place in full compliance with current legislation on prevention and protection as well as environmental protection and energy efficiency.

For example, although not exhaustive, the SAPONIFICIO RONDINELLA SRL is committed to promoting health and safety in the workplace through:

- a) Valuation and risk prevention;
- b) Individual and Collective protection measures ;
- c) Internal training and awareness of staff in Health and Safety in the Workplace Environment;
- d) Periodic Medical visits;
- e) Periodical check on Anti-Fire devices;



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### **6.3 Child labor**

SAPONIFICIO RONDINELLA SRL does not tolerate child labor.

### **6.4 Sexual harassment**

SAPONIFICIO RONDINELLA SRL does not tolerate sexual harassment, to mean: the subordination of pay or career prospects to the acceptance of sexual favors; proposals of private interpersonal relationships, made despite express or reasonably clear distaste, which have the capacity, in relation to the specificity of the situation, to disturb the serenity of the recipient.

### **6.5 Abuse of alcohol and drugs**

SAPONIFICIO RONDINELLA SRL requires that each employee contribute personally to maintaining a work environment respectful of the feelings of others. Are therefore considered to be unlawful behaviors: working under the effects of alcohol abuse, drugs or substances with similar effect; consume or give for whatever reason drugs and / or alcohol during work performance.

### **6.6 Smoke**

SAPONIFICIO RONDINELLA SRL., In view of the desire to create for its employees and visitors a healthy and comfortable environment, imposes a general ban on smoking in the workplace.

### **6.7 Prohibition of discrimination**

In conducting the SAPONIFICIO RONDINELLA SRL business, employees must respect the dignity, rights and cultural differences of individuals. SAPONIFICIO RONDINELLA SRL policy does not discriminate on the Employees and observe the principle of equal employment opportunities without distinction of age, sex, race, religion, color, physical disability, nationality, marital status or sexual orientation. No form of mobbing will be tolerated.

### **Art.7 – Environment Protection and Sustainability**

SAPONIFICIO RONDINELLA SRL aim at reducing the environmental impact of their products and manufacturing process and at respecting ecosystem and biodiversity through soil conservation and management of the surrounding territory.

SAPONIFICIO RONDINELLA SRL aim at applying any environmental law and regulation (waste management, water/waste disposal, air emissions, noise pollution).

Our company is also committed to following the principle of reducing the use of resources, resorting where possible to the reuse and recycling of materials, and to the control of GHG (Greenhouse Gas) emissions.

### **7.1 Biodiversity**

SAPONIFICIO RONDINELLA SRL aim at preserving Biodiversity in all their activities and in the entire supply chain.

### **7.2 Sustainable Product and Packaging.**

SAPONIFICIO RONDINELLA SRL aim at reducing as much as possible the environmental impact of their products and packaging by promoting among their clients the principle of the sustainable design: use of raw materials coming from sustainable, renewable sources, use of recycled, sustainable, recyclable packaging coming from renewable sources.



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### **Art. 8 - Reference bodies for the application of the Code of Ethics**

The reference body for the implementation of the Code of Ethics is the Direction to which to refer, in the case of reporting a violation of the Code of Ethics. The signal can be carried out directly or through anonymous tip in a special little box marked "REPORTING VIOLATIONS CODE OF ETHICS" (see attachment. A - Reporting Form - Code of Conduct violation).

### **Art. 9 - Disciplinary System and protection measures in the event of non-compliance with the requirements of the Code of Ethics**

#### ***9.1. Actions Against Employees***

The Direction will apply the disciplinary measures provided by C.C.N.L. if applicable and in case of a crime, will report the violation/offense to the competent judicial authorities

#### ***9.2. Measures against External Collaborators***

The Direction will report violations/illicit behavior to the competent judicial authorities.



# SAPONIFICIO RONDINELLA SRL

## ALL. A – REPORTING FORMAT OF ETHICAL CODE VIOLATION

SAPONIFICIO RONDINELLA s.r.l.	FORMAT REPORT		
GERENZANO	VIOLATION OF ETHICAL CODE	Rev. n. 4 23rd Jan 2026	Pag. 1 / 1

<b>REPORTING FORM OF VIOLATION OR SUSPECTED VIOLATION OF THE CODE OF ETHICS</b> <i>Signaling of the breach or fraudulent elution of the Code of Ethics of Saponificio Rondinella Srl.</i>
<b>AUTHOR OF THE CONDUCT THAT IS BEING REPORTED :</b>
<b>DETAILED DESCRIPTION OF THE BEHAVIOR THAT IS BEING REPORTED:</b>
<b>DATA OF THE REPORTER (IN CASE OF NOT ANONYMOUS REPORT)</b> Name: _____ Surname: _____ Occupation: _____ Telephone: _____ E-mail: _____
Date _____ Sign _____
<b>Information pursuant to Article 13 of EU Regulation 2016/679 on the Protection of Personal Data and the Privacy Code (Legislative Decree 196/2003), as amended by Legislative Decree 101/2018</b> The personal data collected through this form will be processed both manually and electronically for the purposes of fulfilling the obligations set forth in EU Regulation 2016/679. The data controller is the Company, including through the Internal Supervisory Body responsible for the reporting procedure. Providing your data is optional, but without it, the Data Controller reserves the right not to process the information received. Your consent to the processing is not required pursuant to Article 7 of EU Regulation 2016/679 on the Protection of Personal Data. Your personal data will not be communicated or disseminated, and may be disclosed to the Supervisory Body, where necessary to adopt appropriate measures. You may exercise the rights recognized by Articles 15 et seq. of the same Regulation, including: 1) obtaining, without delay, confirmation of the existence or otherwise of personal data concerning you; 2) obtaining: a) information on the source of the personal data, the purposes and methods of processing, the logic behind the processing carried out with the aid of electronic means, the identification details of the data controller or processors, the persons or categories of persons to whom the data may be communicated or who may become aware of it as data processors or persons in charge of processing; updating, rectification, or, where interested therein, integration of the data; b) erasure, anonymization, or blocking of data processed unlawfully. To exercise the aforementioned rights, you may apply directly to the Management or through anonymous tip in a special little box marked "REPORTING VIOLATIONS CODE OF ETHICS"