

A photograph of a modern, multi-story building with a white facade and large windows. The building is partially obscured by a series of thin, dark blue wavy lines that sweep across the left side of the image. The sky is a clear, bright blue.

Our Code of Conduct



INDEX

Foreword by the Italdesign Management Team 5

Italdesign Values 7

Introduction 8

We are committed individuals: our culture rooted in our values 10

1.1. Human Rights 12

1.2. Ethical Leadership 13

1.3. Diversity, equal opportunities and equal participation 14

1.4. Honesty and Integrity 15

1.5. Employee representation 16

We are reliable colleagues: our responsibility to protect people, assets and knowledge 18

2.1. Occupational health and safety 20

2.2. Handling Company assets 21

2.3. Security and protection of information, know-how and intellectual property 22

We are responsible partners: integrity and compliance in the way we do business 24

3.1. Conflicts of interest 26

3.2. Gratuities 27

3.3. Prohibition of corruption 28

3.4. Prohibition of insider trading 29

3.5. Prohibition of money laundering and terrorism financing 30

3.6. Fair and free competition 31

3.7. Business partners, procurement and sales 32

3.8. Financial and accounting report 33

3.9. Export control 34

We act responsibly in society and in the market 36

4.1. Communication and marketing 38

4.2. Dealing with public officials 39

4.3. Donations and social sponsorships 40

4.4. Taxes and customs 41

4.5. Data protection 42

4.6. IT security 43

4.7. Environmental protection 44

We act with integrity, we report with responsibility 46

Support and Whistleblowing System 46

Self-test for Decision Guidance 48

Foreword by the Italdesign Management Team

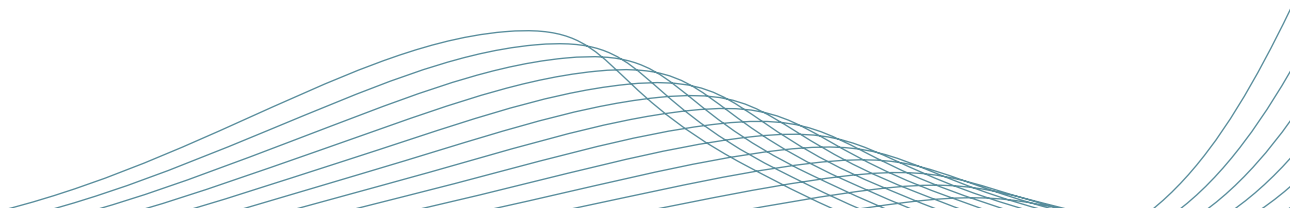
Dear colleagues,

our ambition is to inspire and contribute to positive change. How we pursue this goal matters as much as the goal itself, and it requires us to act every day with integrity, responsibility, and a strong sense of accountability.

We are aware of the responsibility we have toward our colleagues, our customers, and the communities in which we operate. Living up to this responsibility is not always straightforward: it requires consistency, sound judgment, and, at times, the ability to make difficult decisions.

We believe that trust is built over time — through transparency, reliability, and the way we behave in everyday situations, especially when things are not black and white. For this reason, we continuously challenge ourselves to improve, question our assumptions, and remain open to change.

Collaboration is at the core of how we work. We value diverse perspectives and know that better outcomes come from listening, exchanging views, and working together toward a shared direction.





With the update of the Company's Code of Conduct, we — the Italdesign Management Team — want to reaffirm the importance of this document as a practical reference for our daily activities. It is not simply a formal framework, but a guide to support our decisions whenever we face situations of uncertainty and complexity.

The Code of Conduct, together with the "Organization, Management and Control Model" adopted pursuant to Italian regulations (Legislative Decree 231/2001), is a key component of our approach to preventing misconduct and protecting the Company from potential risks.

As the Italdesign Management Team, we are committed first and foremost to applying these principles in our own actions. At the same time, we will support their understanding across the Company through dedicated training and communication initiatives, so that they can effectively guide everyday behaviors.



**Italdesign
Management Team**

Italdesign Values

PASSION FOR EXCELLENCE

Quality is not declared — it is designed, built, and demonstrated.

Every activity reflects the very best we are capable of delivering.

Passion is the care we devote to every detail.

This is how excellence takes shape.

TOGETHER WITH THE CLIENT

We do not work for the client; we work with the client — whether external or within our organization.

We cultivate valuable relationships across all functions, because every contribution matters.

We bring expertise, reliability, and accountability to every project.

Trust is not a promise — it is the result of what we consistently achieve together over time.

THE COURAGE TO INNOVATE AND CHANGE

We challenge the status quo to open new paths forward.

Innovation and change are conscious choices.

We go beyond improving what exists: we question models and habits when they no longer reflect reality.

We do so responsibly, engaging people and leading change together.

HONESTY AND INTEGRITY

Transparency guides every action we take.

We acknowledge mistakes, anticipate challenges, and honor our commitments.

Because credibility is built through consistency, every single day.

DIVERSE PERSPECTIVES, SHARED STRENGTH

Collaboration goes beyond coordination: it is the exchange and integration of diverse skills, cultures, and perspectives.

We believe the strongest solutions emerge from this diversity and that value is created through shared contribution.

Different people, one common direction.

RESPONSIBILITY WITH IMPACT

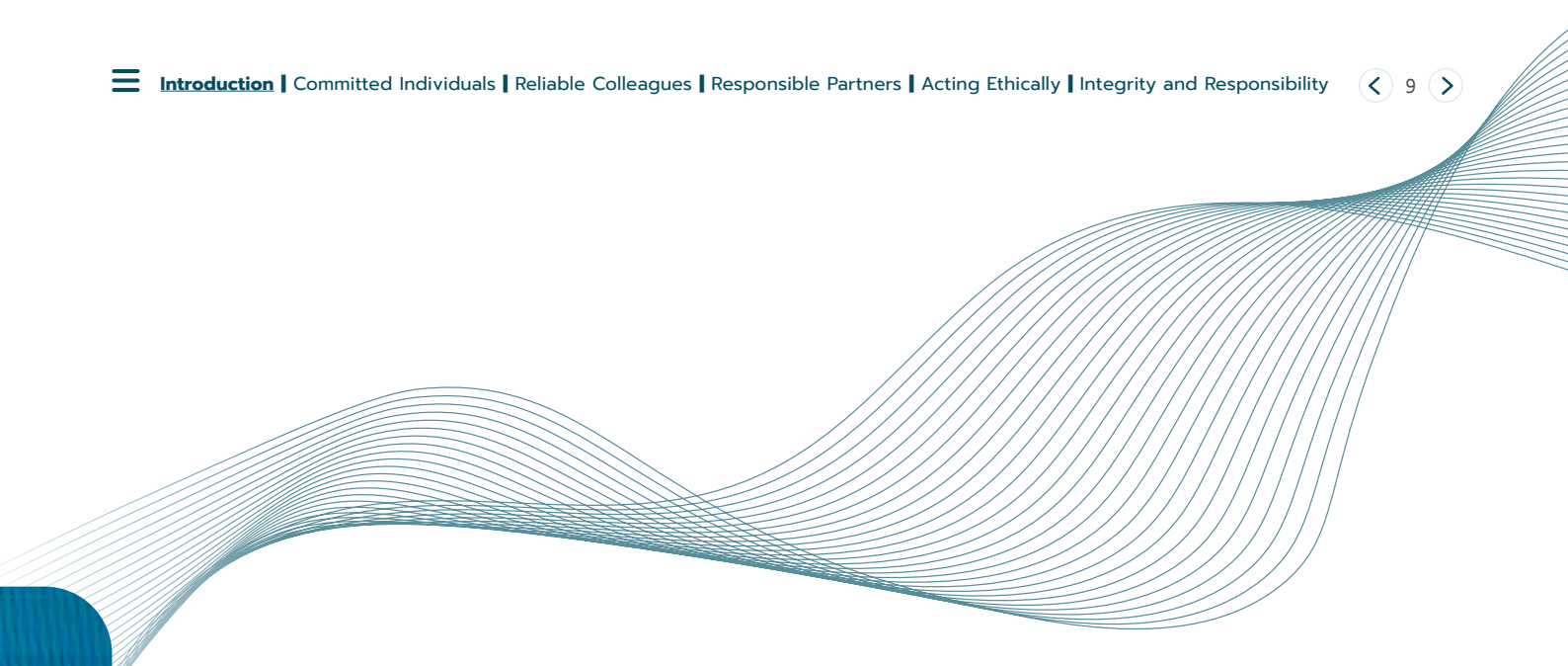
Responsibility means making conscious choices, stepping forward, and being accountable for our actions.

We act with full awareness of our impact on people, projects, and the environment.

Because our work is not limited to the present - it is about building what endures.

Introduction





Italdesign's Code of Conduct provides a binding framework for acting with integrity and in compliance with applicable national and international laws or regulations, as well as with the Company's internal rules.

The Code of Conduct serves as a guide to identify appropriate behaviors and support informed decision-making, based on ethics, transparency and respect for Italdesign's corporate culture.

Accordingly, the Code of Conduct of Italdesign is binding for all members of the Board of Directors, employees, external staff and third parties, such as suppliers and business partners, connected to Italdesign (hereinafter referred to as "Recipients").

All Recipients are required to act with rigor and professional commitment to protect Italdesign's reputation and foster relationships based on trust and mutual cooperation.

Whether internal or external, Recipients must conduct themselves in compliance with applicable laws and this Code in all operations and activities related to the Company.

We are committed
individuals: our culture
rooted in our values





1.1. Human Rights

1.2. Ethical Leadership

1.3. Diversity, equal opportunities
and equal participation

1.4. Honesty and Integrity

1.5. Employee representation

1.1. HUMAN RIGHTS

CORPORATE PRINCIPLE

Respect for human rights is a fundamental value for our Company. We believe that long-term economic success can only be achieved by conducting business with ethics and integrity. In the course of all our activities, we fully acknowledge and embrace our responsibility to uphold human rights.

The Italdesign Management Team has strengthened this commitment by adopting dedicated guidelines and regulations.

We reaffirm our adherence to key international frameworks and standards, particularly the International Bill of Human Rights and the core labor standards defined by the International Labour Organization (ILO).

Our business practices are aligned with the United Nations Guiding Principles on Business and Human Rights (UN Global Compact), which serve as the foundation for our actions and decisions.

MY CONTRIBUTION



As an employee, I play an active role in promoting respect for human rights. I consider these principles essential and remain alert to any potential violations we may observe or become aware of.

If I identify situations in our work environment that could involve human rights concerns, I take prompt action to address or prevent them. When appropriate, I report the matter to our supervisor or contact one of the channels indicated in the "Support" section.



EXAMPLE



If you notice behaviors or working conditions at a supplier's site that may not align with the Company's commitment to human rights – such as excessive working hours, discriminatory practices, or unsafe environments – you should not ignore them. You are expected to remain attentive and take responsibility by informing your supervisor and the whistleblower system of your concern. Our Company will examine the allegations in greater detail and take the necessary measures. This may include terminating business relations with the supplier in question.

1.2. ETHICAL LEADERSHIP

CORPORATE PRINCIPLE

We stand by our organization's values, standards, and guidelines, taking ownership of both personal development and collective progress. We lead through our actions, carrying out our responsibilities with fairness, accountability, and respect.

This commitment extends to everyday interactions in the workplace, where we ensure that positions of authority or relationships are never misused. Our decisions are transparent, thoughtful, and guided by strong ethical principles, always considering what is best for the Company, its people, partners, and stakeholders.

By leading with integrity, we build trust and actively support the Company's growth and transformation.

MY CONTRIBUTION



I recognize my responsibility to act as a role model, both within the organization and beyond. I conduct myself with integrity and accountability, aligning my actions with the Code of Conduct as well as the Company's values and principles.

I encourage a culture of openness, honesty, and respect, where different perspectives are welcomed and constructive dialogue is valued.



EXAMPLE



To meet a tight deadline, some colleagues suggest skipping a required step in the process. You highlight that Company rules and principles must be respected, even under pressure. Together, you identify an alternative solution that allows you to meet objectives while remaining compliant. By acting consistently with Company values, you contribute to leading by example in your daily work—regardless of your role.



1.3. DIVERSITY, EQUAL OPPORTUNITIES AND EQUAL PARTICIPATION

CORPORATE PRINCIPLE

Diversity, equal opportunity, and full participation are essential to ensuring a fair, respectful, and non-discriminatory workplace. We are committed to fostering a culture based on partnership, tolerance, and mutual respect. We promote diversity within our workforce and actively support an inclusive working environment.

We are dedicated to providing equal opportunities to all individuals and strictly oppose any form of discrimination. This includes unequal treatment based on ethnic or social background, skin color, gender, nationality, language, religion, beliefs, age, physical or mental abilities, gender identity, sexual orientation, political opinions, or any other characteristic protected by law. We embrace diversity, actively encourage inclusion, and strive to create an environment that values the contributions and individuality of every employee, strengthening both engagement and organizational success.

Any form of discrimination or harassment is strictly forbidden and will not be tolerated. Recruitment, employment, and career development decisions are based solely on merit, qualifications, and performance.

MY CONTRIBUTION



I uphold the principles of diversity, equal opportunity, and equal participation, and I encourage others in my workplace to do the same.

If I become aware of any breaches of these principles – such as unfair treatment, harassment, or bullying – I address the behavior by making those involved aware of their actions. If I am unable to intervene directly, I promptly report the situation to the Human Resources department or contact one of the resources provided in the “Support” section.



EXAMPLE



A colleague struggles to participate fully in meetings due to a language barrier. You notice that they are often interrupted, given little time to express their ideas, or excluded from fast-paced discussions where only fluent speakers are able to contribute effectively. As a result, their input is overlooked, even though they have valuable perspectives to share. To support inclusion, you speak clearly and at a moderate pace, avoid unnecessary jargon, and ensure that key points are explained in a way that everyone can understand. You actively give your colleague the opportunity to speak, for example by inviting them to share their opinion and allowing sufficient time for them to respond without pressure. You also encourage other team members to adopt more inclusive behaviors, such as not interrupting, being patient, and summarizing important decisions.

1.4. HONESTY AND INTEGRITY

CORPORATE PRINCIPLE

We aim to learn from our mistakes and continuously improve. For this reason, we speak up about any wrongdoing or whenever something does not feel right, even if doing so may be awkward or uncomfortable. To support this, we foster a culture of integrity and actively encourage open dialogue within our teams and with our supervisors. We seek advice and support whenever we have questions or face challenges, and we protect anyone who contributes to maintaining this culture.

We consider full compliance with both external and internal rules at all times to be fundamental. Misconduct is not tolerated, and we firmly believe that ignoring issues can never be the right approach. Therefore, we respond promptly and appropriately to any misconduct or violations of our rules. Managers lead by example by acting in accordance with all rules and regulations. They fulfill this responsibility by supporting employees in complying with the rules, encouraging a culture that learns from mistakes, and ensuring that any violations are properly addressed.

MY CONTRIBUTION



My primary point of contact regarding questions, concerns, or any reasonable suspicion of a violation of internal or external regulations is my supervisor. Alternatively, I can seek guidance from the relevant subject matter experts. Support is also available from the HR department, employee representatives, and the Compliance function. I can also submit a report through the Italdesign whistleblower system platform.

As a Management Level employee, I have an obligation to report any such suspicions.



EXAMPLE



A presentation has been shared with a client, and afterward you realize that some key assumptions used in the analysis were incorrect. You understand that this may affect the client's decisions.

You should immediately inform your supervisor and the colleagues involved. Together, you prepare a corrected version and communicate transparently with the client. In addition, your team reviews the validation process to prevent similar issues in the future.

1.5. EMPLOYEE REPRESENTATION

CORPORATE PRINCIPLE

We acknowledge and respect the fundamental right of all employees to form and join trade unions and to establish employee representation bodies.

We are committed to engaging with employee representatives in an open, transparent, and trust-based manner, fostering a constructive and cooperative dialogue aimed at achieving balanced and fair solutions. Maintaining professional and respectful relationships with employee representatives is an integral part of our corporate culture.

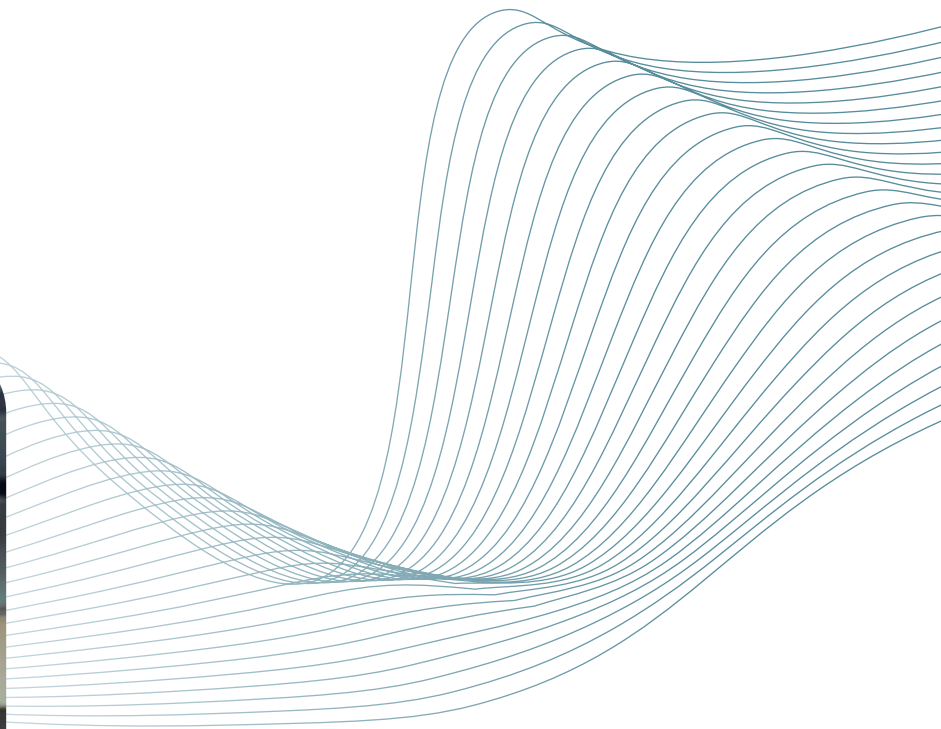
We work to secure the long-term future of Italdesign and its workforce through a cooperative approach to managing disagreements, grounded in social responsibility. This approach is guided by the shared objective of sustaining both economic performance and technological competitiveness, while equally prioritizing efficiency and the protection of employment.





We are reliable colleagues:
our responsibility
to protect people,
assets and knowledge





2.1. Occupational health and safety

2.2. Handling Company assets

2.3. Security and protection
of information, know-how
and intellectual property

2.1. OCCUPATIONAL HEALTH AND SAFETY

CORPORATE PRINCIPLE

At Italdesign, the health and safety of the people who work with us is a fundamental value and a shared responsibility. Protecting physical integrity and psychological well being is an essential condition for the way we design, develop and operate as an international Company.

We take our responsibility for occupational health and safety seriously and integrate it into every activity, decision, and workplace. Italdesign promotes a safe and healthy working environment in full compliance with applicable laws and regulations, international standards, and the Integrated Policy.

We firmly believe that a strong safety culture is key to our long term sustainability and to remaining an attractive employer. Workplace accidents and work related illnesses are, in most cases, preventable. For this reason, we are committed to continuously identifying risks, improving processes and protecting both physical and mental health. Achieving this goal requires active involvement, awareness and cooperation from everyone.

MY CONTRIBUTION



At Italdesign, I know that safety starts with my daily behavior. I comply with health and safety rules, procedures and instructions, even when this requires extra attention or time, because I understand that safe choices protect me and the people around me.

I act responsibly to safeguard my own health and safety, as well as that of my colleagues and third parties. When something does not appear safe, I speak up and report unsafe conditions, behaviors or near misses, without ignoring risks or assuming that someone else will intervene.

Within my area of responsibility, I contribute to creating and maintaining a safe working environment by adopting all required and statutory measures.

I attend mandatory training, follow instructions and apply what I learn in my daily activities. I also take an active role in my own well being by participating in preventive healthcare and health promotion initiatives promoted by the Company. At Italdesign, caring for health and safety means caring for people every day, in every role.



EXAMPLE



You experience or witness a near miss — an event that could have caused an accident but did not.

You report it through the appropriate channels, even though no one was hurt. You know that sharing these situations helps prevent future incidents and improves safety for everyone.

2.2. HANDLING COMPANY ASSETS

CORPORATE PRINCIPLE

We respect and protect the Company's tangible and intangible assets and use them solely for legitimate business purposes and in line with applicable laws, regulations, and internal policies.

The use of Company assets and data must always be authorized, appropriate, and consistent with the employee's role and responsibilities. Any use for personal purposes is permitted only where expressly allowed by internal policies and guidelines.

Under no circumstances may Company assets or data be used for illegal, unethical, or improper activities. All individuals are expected to safeguard Company resources against misuse, loss, or unauthorized access, ensuring their integrity and proper use at all times.

MY CONTRIBUTION



I comply with the Company's rules, with particular attention to Italdesign Corporate Security and Information Security policies. I handle Company assets responsibly and with due care.



EXAMPLE



You experience or witness a near miss – an event that could have caused an accident but did not.

You report it through the appropriate channels, even though no one was hurt. You know that sharing these situations helps prevent future incidents and improves safety for everyone.

2.3. SECURITY AND PROTECTION OF INFORMATION, KNOW-HOW AND INTELLECTUAL PROPERTY

CORPORATE PRINCIPLE

We recognize the importance of the Company's know-how and are committed to protecting it with the utmost care. We also respect the intellectual property rights of customers, competitors, business partners, and all third parties.

MY CONTRIBUTION



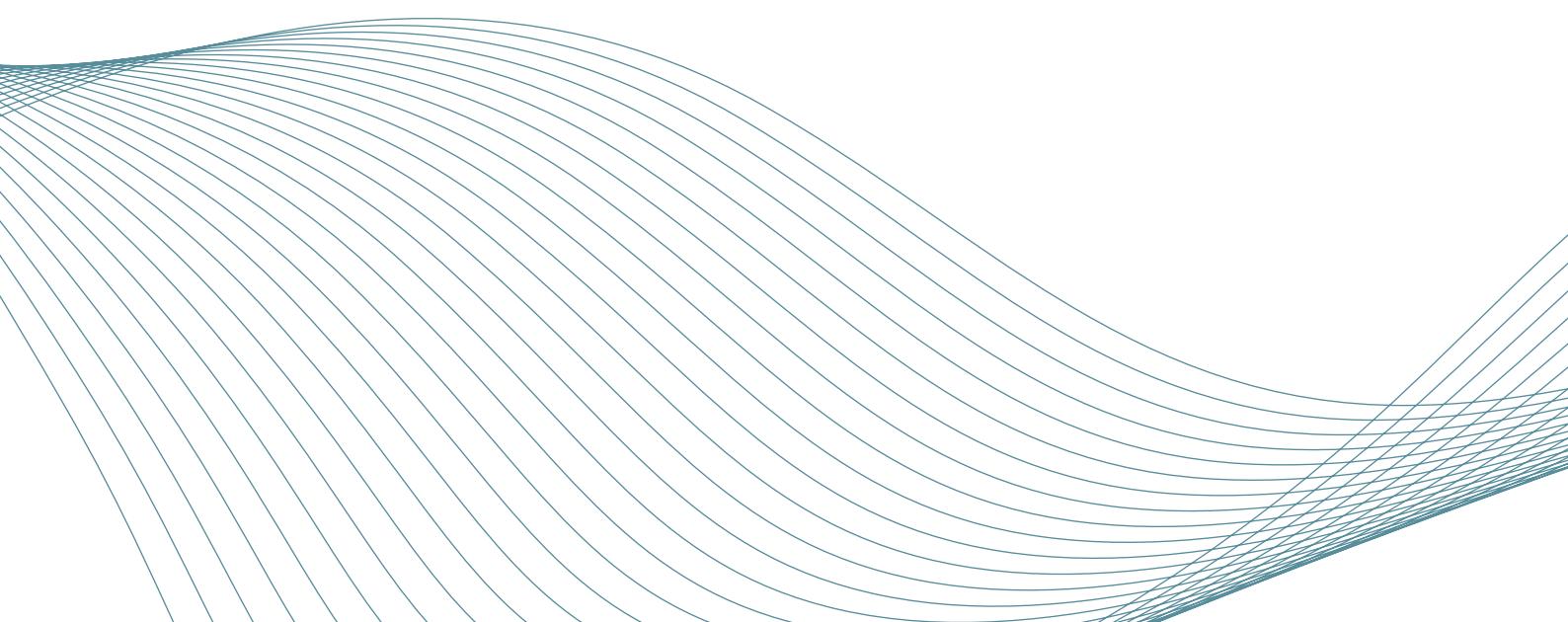
I handle Company, customers and business partners information with the highest level of care and ensure that it is not disclosed to unauthorized individuals. I pay special attention to safeguarding sensitive information, including technical expertise, patents, and trade and business secrets.



EXAMPLE



You have contributed to a technical innovation that is about to be launched. While traveling home by train, you consider discussing it with a colleague. You refrain from doing so, as you are aware that ideas, patents, and technical developments are part of the Company's intellectual property and must not be discussed in public or non-secure environments. If in doubt, you seek guidance from your supervisor or the relevant department.





We are responsible
partners: integrity
and compliance in the
way we do business





3.1. Conflicts of interest

3.2. Gratuities

3.3. Prohibition of corruption

3.4. Prohibition of insider trading

3.5. Prohibition of money laundering
and terrorism financing

3.6. Fair and free competition

3.7. Business partners, procurement
and sales

3.8. Financial and accounting report

3.9. Export control

3.1. CONFLICTS OF INTEREST

CORPORATE PRINCIPLE

We conduct our business responsibly and therefore place strong emphasis on preventing conflicts of interest in the course of our professional duties. We are also committed to identifying and transparently disclosing any actual or potential conflicts that may arise.

A conflict of interest occurs when an employee's personal or financial interests influence, or could potentially influence, their business judgment. Such situations may arise directly from the employee or through individuals connected to them, for example in the case of secondary employment, memberships, or personal financial relationships.

Conflicts of interest may also emerge in business relationships with third parties, such as suppliers or partners, where personal interests could compromise objective and impartial decision-making.

MY CONTRIBUTION



If I identify or suspect that I may be facing a potential conflict of interest, I promptly inform my supervisor as well as the relevant HR and Compliance departments, ensuring full transparency of the situation. If a conflict is confirmed, I work together with the appropriate functions to find a solution that protects the interests of the Company.



EXAMPLE



You are involved in selecting a supplier and realize that one of the bidding companies is owned by a close friend.

Inform your supervisor of the situation, document the possible conflict of interest, and withdraw from the decision-making process to avoid any appearance of a conflict of interest.

3.2. GRATUITIES

CORPORATE PRINCIPLE

Benefits in the form of gifts, invitations, or business meals are permitted only when they are appropriate, transparent, and in line with professional standards.

We strictly comply with national and international anti-corruption laws and regulations, addressing both active and passive corruption. We reject any form of improper conduct involving the offering or receiving of undue advantages.

Our internal policies clearly define what is acceptable and outline the procedures to be followed when offering or receiving such benefits, ensuring that all interactions remain ethical and compliant.

MY CONTRIBUTION

I act in compliance with anti-corruption laws and internal policies when offering or accepting gifts, invitations, or business meals. I ensure that any benefit is appropriate, transparent, and does not influence – or appear to influence – business decisions. If I am unsure whether a situation is acceptable, I seek guidance from my supervisor or the Compliance function before taking action.

EXAMPLE



A business partner sends you a gift card as a token of appreciation for the collaboration. You believe that accepting it would not influence your professional behavior. However, you are aware that cash equivalents, such as gift cards, are not permitted under Company policies. You therefore decline or promptly return the gift and inform your supervisor or the relevant function to ensure full transparency and compliance.

3.3. PROHIBITION OF CORRUPTION

CORPORATE PRINCIPLE

Corruption is strictly prohibited worldwide. It occurs when an individual misuses their professional position to obtain an improper advantage for themselves or for a third party, thereby causing harm to others.

Benefits such as gifts or invitations, particularly when interacting with public officials, may be considered indicators of corrupt behavior. For this reason, such benefits must remain exceptional in business relationships. They may only be offered or accepted in full compliance with applicable laws and internal Company policies.

MY CONTRIBUTION



I remain vigilant to any situation that could be perceived as corruption and act transparently at all times. I consult internal policies before granting or accepting gifts and invitations. If I have any doubts, I seek guidance from my supervisor or the Compliance function before taking action.



EXAMPLE



During a business trip, you meet with a business partner who, at the end of the meeting, presents you with a gift.

You review the gift and assess whether it is appropriate in light of the Company's policy. If you consider the gift to be inappropriate, you politely but firmly decline it.

If you are uncertain about the appropriateness of the gift, or if refusing it might be considered offensive and could negatively impact the business relationship, you contact the Compliance department to seek guidance and agree on the appropriate course of action.

3.4. PROHIBITION OF INSIDER TRADING

CORPORATE PRINCIPLE

We manage all sensitive and non-public information in accordance with applicable capital market regulations and maintain a zero-tolerance approach to insider trading.

Insider information is defined as specific information that has not been publicly disclosed and which, if released, could have a significant impact on the value of financial instruments – such as stocks or shares – or affect business decisions.

Information concerning confidential projects, strategic initiatives, financial data, or other matters relevant to insider knowledge may be used strictly for internal purposes and in line with applicable policies. It must not be disclosed to external parties, including family members, friends, business partners, or any unauthorized individuals.

MY CONTRIBUTION



I do not engage in insider trading, nor do I recommend or encourage any third party to do so. I disclose insider information only when strictly necessary for the performance of my duties and in full compliance with applicable internal policies. I do not buy or sell financial instruments based on such confidential information, nor do I share or trade such information with others.

I make a conscious effort to stay informed about the relevant rules and ensure that I understand and comply with all requirements related to the handling of insider information.



EXAMPLE



At work, you discover that a key supplier is on the verge of signing a major contract that could substantially increase its value. You think about buying shares in that supplier before the news becomes public.

However, you decide not to proceed. Trading based on insider information is strictly forbidden and may result in serious legal consequences.

3.5. PROHIBITION OF MONEY LAUNDERING AND TERRORISM FINANCING

CORPORATE PRINCIPLE

Money laundering occurs when funds or assets derived, directly or indirectly, from criminal activities are introduced into the legal economy in a way that conceals their illegal origin.

Terrorist financing refers to the provision of money or other resources to support terrorist acts or organizations. Liability may arise even without full awareness, as unintentional involvement in such activities can already constitute a criminal offense.

For this reason, the Company conducts thorough checks on the identity and integrity of customers, business partners, and other third parties before establishing business relationships. The objective is to work exclusively with reputable partners who comply with legal requirements and use funds from legitimate sources.

Incoming payments are promptly matched to the relevant services and accurately recorded. We ensure full transparency and traceability of all financial transactions.

MY CONTRIBUTION



I remain vigilant in all financial transactions and business relationships. I ensure that I only work with reputable partners and that all payments and transactions are transparent, traceable, and properly documented.

I pay attention to unusual or suspicious activities, such as unclear payment sources, irregular transaction patterns, or requests for non-transparent arrangements. If I identify or suspect any such risks, I promptly report them to my supervisor or the Compliance function. I abide by all applicable provisions for recording and posting transactions and contracts within my area of responsibility in the accounting system.



EXAMPLE



A customer requests to make a large payment in cash or through an unusual payment method that deviates from standard practice.

You do not accept the request and report the situation, as it may indicate an attempt to conceal the origin of funds. Seek advice from the contact person responsible for money laundering prevention.

3.6. FAIR AND FREE COMPETITION

CORPORATE PRINCIPLE

Free and fair competition is protected by antitrust laws across the globe. Compliance with these regulations is crucial to ensure that market dynamics remain balanced and are not unfairly distorted, for the benefit of all market participants.

For this reason, any agreements or coordinated actions between competitors that aim to restrict or hinder normal competitive processes are strictly forbidden. Examples of such conduct include the exchange of information on prices or pricing components, contractual conditions, the division of customers or geographic markets, as well as limitations on innovation. The sharing of competitively sensitive information is equally prohibited.

The abuse of a dominant market position is not allowed. Likewise, in the context of partnerships or corporate transactions, all applicable merger control regulations must be carefully followed.

Violations of competition rules can severely damage the Company's reputation and may result in significant sanctions, including fines, penalties, and claims for damages.

Our business operations are based on principles of fairness, merit, and open competition, in line with market-driven practices. We compete with other market players in a transparent and responsible way, fully respecting applicable laws and ethical standards.

We do not engage in arrangements that could restrict competition with competitors, suppliers, or customers. When we operate from a strong market position, we do so responsibly and avoid any behavior that could be considered an abuse of that position.

MY CONTRIBUTION



Whenever I interact with competitors, I make sure that no information is shared that could disclose or suggest our current or future business strategies.

In meetings, discussions, or any type of interaction with competitors, I avoid topics that could affect or relate to the competitive relationship between us.



EXAMPLE



During an industry association meeting, a participant proposes sharing information on customer allocations in order to "avoid overlap" in the market.

You promptly clarify that such a discussion would breach competition rules and must not proceed. You ensure that the topic is discontinued and, if appropriate, report the incident to the Legal department.

3.7. BUSINESS PARTNERS, PROCUREMENT AND SALES

CORPORATE PRINCIPLE

At Italdesign, we select suppliers, service providers and business partners with care and integrity. Our choices are based on objective, transparent, and competitive criteria, with the aim of building reliable and sustainable relationships over time.

We work exclusively with partners who operate in compliance with applicable laws, internal rules, and Company policies. Before entering into any business relationship, we conduct appropriate integrity and due diligence checks, in line with Italdesign's internal processes and procedures. These checks help prevent risks and ensure alignment with our commitment to ethical and responsible business practices.

Procurement and sales activities are conducted in close collaboration with the relevant internal functions, which are involved from an early stage and in accordance with applicable policies and procedures. Fair competition, separation of roles, and traceability of decisions are essential elements of our approach. Through this structured and transparent process, we aim to protect the Company, our partners, and the markets in which we operate.

MY CONTRIBUTION



In my daily activities, I ensure that business partners, suppliers, and service providers are engaged only after the checks required by Italdesign's internal policies and procedures have been completed.

I act impartially and base my decisions on objective and transparent criteria, avoiding any form of favoritism or conflict of interest. I support fair competition and make responsible choices by gathering adequate market information and considering alternative solutions before purchasing products or services.

I comply with applicable procurement guidelines and involve the relevant internal functions, including Purchasing and other competent departments, from an early stage of the process. I ensure that payments are made only for services actually rendered and that remuneration is appropriate and proportionate to the agreed performance.



EXAMPLE



During an ongoing collaboration with a supplier, you become aware of information suggesting potential compliance or reputational concerns related to the supplier's business practices. Instead of ignoring the situation because the relationship is already established, you inform your supervisor and the relevant internal functions, so the issue can be assessed, and appropriate actions can be taken. You understand that due diligence is not a one time activity, but a continuous responsibility aimed at protecting Italdesign and ensuring that business relationships remain aligned with the Company's ethical standards.

3.8. FINANCIAL AND ACCOUNTING REPORT

CORPORATE PRINCIPLE

We fully comply with all legal requirements for accurate accounting and financial reporting. Transparency and accuracy are essential priorities, as any irregularities may lead to serious consequences for both the Company and the individuals involved.

To ensure this, we regularly provide our shareholders and corporate bodies with clear information about our financial position and business performance. Our periodic financial statements are prepared and published in a timely manner, in accordance with applicable national and international accounting regulations.

MY CONTRIBUTION



I ensure that processes are organized in a way that guarantees all financial business data are recorded accurately and without delay in the accounting system. If I have any doubts regarding the correct recording of data, I consult my supervisor or the relevant finance department.



EXAMPLE



You urgently need new equipment. However, your department's budget for the current fiscal year has already been fully used. You consider purchasing the equipment anyway and recording the expense in the following fiscal year, once the budget is renewed. You must not proceed in this way. All entries must be recorded accurately and assigned to the appropriate period. Incorrect accounting entries can have serious consequences for both the Company and the individual employee.

3.9. EXPORT CONTROL

CORPORATE PRINCIPLE

We recognize our responsibility to comply with applicable export control and sanctions laws and are fully committed to adhering to all relevant requirements.

International business activities may be subject to restrictions, prohibitions, licensing obligations, or other regulatory controls under export control frameworks. These measures may concern business partners, goods, destinations, financial flows, or the intended end use. They apply not only to physical products, but also to technologies and software.

Such rules also cover temporary cross-border movements and the transfer of technical information, including by electronic means such as email or cloud-based systems. In certain cases, import activities may also fall within the scope of export control regulations.

We ensure that all our operations are conducted in full compliance with applicable export control laws and internal policies.

MY CONTRIBUTION



I make sure I stay informed about internal policies and guidance related to export control by reviewing them on a regular basis. This enables me to understand whether my daily activities are subject to export control requirements. If I identify or suspect a potential breach within my area of responsibility, I promptly take appropriate steps to stop it and address the situation. Whenever I am uncertain, I seek guidance from the designated export control contact.



EXAMPLE



You are considering establishing a business relationship with a prospective customer who may be listed on a sanction register. You ensure full compliance with applicable regulations and consult the appropriate export control function to determine and align on the necessary next steps.



We act responsibly in
society and in the market





- 4.1. Communication and marketing
- 4.2. Dealing with public officials
- 4.3. Donations and social sponsorships
- 4.4. Taxes and customs
- 4.5. Data protection
- 4.6. IT security
- 4.7. Environmental protection

4.1. COMMUNICATION AND MARKETING

CORPORATE PRINCIPLE

Italdesign's reputation depends on an accurate and consistent communication, aligned with the Company's positioning. All external communications must be managed in accordance with the guidelines defined by the Communications department. This includes, but is not limited to: media relations, public statements, conference presentations, professional social media activity, and any engagement with public institutions, regulatory bodies, industry associations, and other external organizations.

Only authorized spokespersons are permitted to make official statements on behalf of the Company. Employees who are contacted by media, public institutions, or any external organization requesting an official position must refer such requests to the Communications department without delay and must refrain from giving out unacknowledged information.

Employees who engage on professional social media platforms are personally responsible for the content they publish. Any content relating to Company activities, projects, or positions must be consistent with Italdesign's guidelines. For detailed guidance on social media conduct, refer to the Italdesign Social Media Guideline (GL_IGV_P001).

MY CONTRIBUTION



I do not make public statements on behalf of Italdesign without prior authorization. When contacted by media, public institutions, industry associations, or any external party requesting an official position, I refer the request to the Communications department.

When I engage on social media or at public events, I make clear that I am expressing my personal view and not an official Company position. I follow Italdesign's Social Media Guideline for advice on appropriate conduct online.



EXAMPLE



An Italdesign employee publishes a LinkedIn post commenting on a strategic announcement made by the Company, adding personal interpretations not included in the official communication. A colleague notices the post and flags it to the Communications department. The Communications department contacts the employee to clarify the applicable guidelines and, where necessary, coordinates with them to publish a follow-up clarification. The situation is then assessed to determine whether a public response is required.

4.2. DEALING WITH PUBLIC OFFICIALS

CORPORATE PRINCIPLE

Due to national and international legislation, there is an increased risk of corruption when dealing with public officials. This is reflected in our internal policies, which define a clear framework regarding the provision of benefits.

In particular, we do not make any facilitation or expediting payments, i.e., payments to public officials intended to facilitate or expedite regular or routine official actions.

MY CONTRIBUTION



I am aware that there is an increased risk of corruption when dealing with public officials. Therefore, I familiarize myself with the applicable specific rules. I understand that I have a binding obligation to consult the Compliance department in this regard.



EXAMPLE



The guests invited to a full-day event include a university professor, who has been asked to give a lecture. You are considering what you need to keep in mind. Among other things, your department would like to invite the guests to lunch.

Because the rules governing dealings with public officials – this also includes academic staff at state universities – are especially strict, seek the advice of the relevant Compliance department in advance.

4.3. DONATIONS AND SOCIAL SPONSORSHIPS

CORPORATE PRINCIPLE

Donations and sponsorships are instruments through which Italdesign supports social, cultural, scientific, and charitable initiatives, contributing positively to society and to the Company's reputation. Donations are understood as voluntary contributions made without any return service, while sponsorships are based on a contractually agreed consideration. To prevent conflicts of interest and ensure consistent and responsible behavior across the Company, all donations and sponsorships are permitted only within the applicable legal framework and in compliance with Italdesign's internal rules.

In particular, all donation and sponsorship initiatives are subject to a transparent approval process. Contributions, whether financial or in kind, are granted exclusively for legitimate purposes and only to duly organized charitable and/or tax-privileged organizations. Transparency, traceability, and integrity are essential to safeguard Italdesign's credibility and public trust.

MY CONTRIBUTION



When I believe that a donation or sponsorship initiative may be worth supporting, I involve the relevant Company functions at an early stage and follow the applicable internal processes.

I ensure that each donation or sponsorship is transparent and properly documented, including its purpose, the beneficiary and the management of the funds or benefits provided. I do not initiate or support any contribution that could create conflicts of interest, violate internal rules or damage the reputation of Italdesign. Through responsible behavior, I help ensure that our social engagement reflects the values of the Company.



EXAMPLE



An opportunity arises to promote a sponsorship related to an external or charitable event that offers visibility for Italdesign.

Before proceeding, involve the relevant Compliance function to assess the initiative, its objectives, and its potential impacts. Every sponsorship must be consistent with Italdesign's values.

4.4. TAXES AND CUSTOMS

CORPORATE PRINCIPLE

As an international organization, we recognize our responsibility to comply with all requirements related to foreign trade, taxation, and customs. We are fully committed to adhering to both national and international laws and regulations in these areas.

MY CONTRIBUTION



I ensure that internal processes and structures are designed to guarantee that all taxes and customs duties owed by Italdesign are calculated accurately, declared transparently, and paid in a timely and complete manner to the appropriate authorities.

If I become aware of any potential breach of tax or customs regulations within my area of responsibility, I take immediate steps to prevent or address it. If I am unable to resolve the issue directly, I promptly involve the relevant contact within the Finance department.



EXAMPLE



You are responsible for recording certain business transactions, such as general overhead costs (e.g. maintenance expenses) and production-related costs, in the statutory financial statements. Early in the financial year, a project exceeds predefined controlling thresholds. You are then instructed to classify a transaction as maintenance expense, although it clearly qualifies as an investment and should therefore be recorded as capitalized production costs.

You record the transaction in accordance with legal and accounting requirements. All financial entries must be accurate and compliant with commercial and tax regulations, as they form the basis for tax declarations. Incorrect accounting may lead to inaccurate tax reporting and expose both the Company and the responsible employees to significant legal risks in relation to tax law.

4.5. DATA PROTECTION

CORPORATE PRINCIPLE

We place great importance on handling data in a responsible, secure, and transparent manner. Personal data is collected, processed, used, and stored in strict compliance with applicable laws and regulations.

We protect the personal information of customers, employees – including former employees and job applicants – as well as business partners such as suppliers and development collaborators.

MY CONTRIBUTION



I handle personal data with confidentiality and ensure a high level of transparency in my actions. I integrate data protection principles into my daily working activities and processes, and I am accountable for maintaining data security within my area of responsibility.

I remain vigilant about secure data management throughout the entire value chain and actively contribute to protecting information. Whenever I have doubts, I consult my supervisor or the Legal department.



EXAMPLE



An IT service provider asks for access to a database containing your team's names, email addresses, and dates of birth, claiming that the service cannot be delivered without this data.

You carefully evaluate the nature of the services and identify which personal data is truly necessary. You ensure that any data processing is required and legally justified, for example by putting in place a formal data processing agreement.

Personal data must not be shared or processed until all requirements under applicable data protection laws have been fully met.

4.6. IT SECURITY

CORPORATE PRINCIPLE

We respect information security and comply with all relevant IT security policies. These guidelines define requirements for different employee groups and apply to everyone within the organization.

MY CONTRIBUTION



I make sure I am familiar with the applicable IT security policies and strictly follow them. As part of the overall information security framework, I actively contribute by remaining alert and keeping my IT security knowledge and skills up to date at all times.



EXAMPLE



You work in technical development and receive an email that appears to come from your CEO. The message urgently asks you to provide documents related to a prototype and instructs you to respond directly, without involving anyone else. You treat the request with caution, recognizing it may be a phishing attempt. Information about prototypes is highly confidential, and access is strictly controlled. You remain calm and do not act under pressure. Instead, you verify the authenticity of the request with your supervisor, for example by contacting the CEO's office through official channels. You also report the suspicious email to the appropriate IT security function.

4.7. ENVIRONMENTAL PROTECTION

CORPORATE PRINCIPLE

At Italdesign, we recognize that environmental protection and sustainability are an integral part of our responsibility as an international Company. The way we design, develop and deliver our products and services has a direct impact on the environment and on future generations.

We aim to contribute actively to the development of sustainable mobility by integrating environmental considerations into our products, processes and workplaces. We promote advanced, efficient and environmentally conscious technologies and apply them throughout the entire lifecycle of our products and of the services we provide, from the earliest design phases through development, production and end-of-life considerations.

We are committed to using natural resources carefully, reducing environmental impacts wherever possible and continuously improving our environmental performance. This includes preventing pollution, minimizing waste and emissions, optimizing energy and water consumption and complying with all applicable environmental laws, regulations and internal standards.

Environmental compatibility is not static. For this reason, we regularly review and improve our products, services and manufacturing processes to ensure they meet evolving environmental expectations.

MY CONTRIBUTION



In my daily work, I act with environmental responsibility in mind. I use resources, materials and energy in an efficient and conscious way, and I consider the environmental impact of my activities and decisions. I follow environmental protection laws, internal procedures and guidelines, and I contribute to reducing waste and emissions within my area of responsibility. When I identify opportunities to improve environmental performance or potential risks for the environment, I raise them through the appropriate channels. I understand that sustainable behavior is not limited to specific roles, but depends on the commitment of each individual.

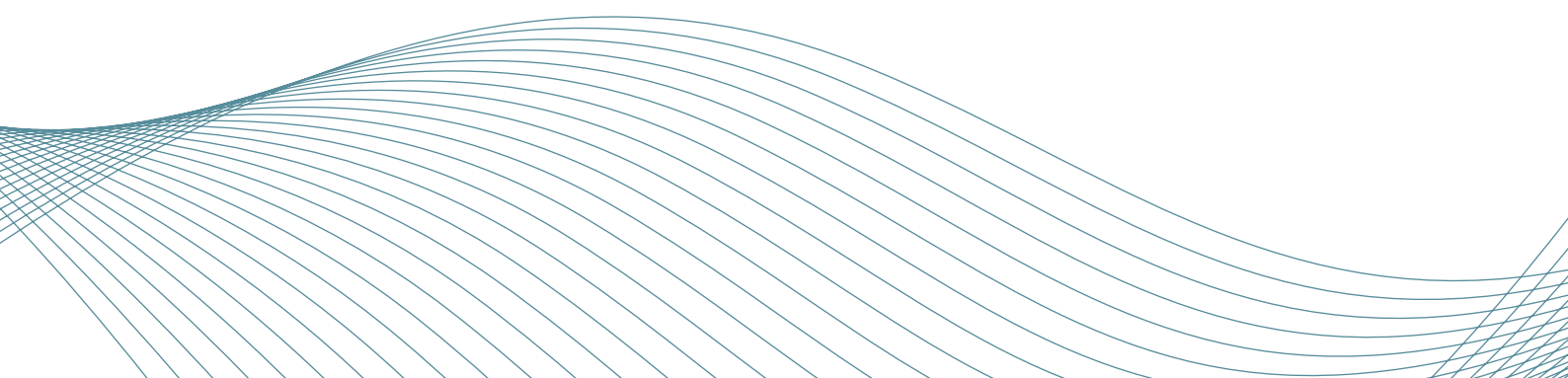


EXAMPLE



At the end of the workday, you notice that lights and electrical equipment remain switched on in an unused meeting room.

You turn off what is not needed and remind colleagues to do the same when leaving shared spaces. You know that reducing unnecessary energy consumption helps lower environmental impact and supports more responsible use of resources.





We act with integrity, we report with responsibility

SUPPORT AND WHISTLEBLOWING SYSTEM

The Italdesign Code of Conduct is an **integral part of the Company's culture**. It defines the **Company's values** and the **expectations** that Italdesign has towards the Recipients.

Italdesign expects the Recipients **to always act in compliance with the law, the Code of Conduct, and the underlying policies and procedures**. Where laws and regulations are more restrictive, they shall prevail.

Italdesign also **expects its business partners to be genuinely aligned with its values** and to adopt a similar level of attention in their activities and value chains, adhering to the same principles set out in the Code of Conduct.

Since the Code of Conduct and corporate policies cannot cover all situations that may arise, Italdesign provides the following contact point in case of doubts or clarifications:



compliance@italdesign.it

If you become aware of any situation that may violate the principles of the Code of Conduct, company policies or procedures, or applicable laws, you are encouraged to report it promptly.

Reporting honestly and truthfully means **playing an active role in safeguarding the Company from potential harm and damage**.

To determine whether it is appropriate to report a situation, employees are always encouraged to **seek support from their Line Manager, the HR function and the Compliance function**.

Reports may be submitted through the Whistleblowing System adopted by the Company, which includes **several reporting channels** accessible to anyone, both inside and outside Italdesign.

Reports may be submitted:



- in written form through the "Italdesign Integrity Line" portal, accessible from the Italdesign website and the corporate intranet, within the Compliance, Integrity and Risk section;

- in written form, in cases where the reported matter may concern violations relevant under Legislative Decree no. 231/2001, to:



- Oversight Body (Organismo di Vigilanza), Via Achille Grandi 25, 10024 Moncalieri (TO) by written report in plain paper, or



- odv@italdesign.it by electronic mail



- in oral form through the "Italdesign Integrity Line", using the option that allows you to record a voice message or by calling the dedicated telephone number indicated on the platform;



- in a face-to-face or online meeting with the Italdesign Compliance Officer.

The purpose of the Whistleblowing channel is to protect the Company, the reporting person, and all individuals who contribute to the investigation, and to stop misconduct.

No person will suffer retaliation in any way for reporting in good faith a misconduct issue through one of our channels. Every report is taken seriously and will be handled carefully and with the highest possible level of confidentiality.

At the same time, the Whistleblower System guarantees the principle of the presumption of innocence towards the reported person until it is proven that the person has committed a violation.

Abuse of the Whistleblowing System (e.g. reports made in bad faith to intentionally accuse others without any basis) is not tolerated and will be sanctioned accordingly.

Conduct that is not in line with Italdesign's way of doing business – detailed in this Code – will compromise the relationship between the Company and the offenders and may result in various types of sanctions. Depending on the severity of the violations, the type of rule breached, the kind of employment relationship, the circumstances of the case, any previous offenses, and any other relevant factor, specific sanctions will be applied in accordance with the law.

SELF-TEST FOR DECISION GUIDANCE

If there is any uncertainty as to whether a behavior complies with the principles set out in the Code of Conduct, the following questions should be considered:

1.

Did I take all relevant matters into consideration and weigh them properly?

2.

Am I confident that my decision complies with legal and company requirements?

3.

Would I stand by my decision if it were made public?

4.

Would I support all similar cases being handled in the same way across the company?

5.

Would I still consider my decision appropriate if the company had to justify it publicly?

6.

Would I accept this decision if I were directly affected by it?

7.

Would I feel comfortable explaining this decision to people whose judgment I respect?

If the answers to questions 1 to 7 are 'yes', the behavior is very likely to be compliant with the principles. If any questions remain unanswered or if there are doubts, one of the points of contact listed in this chapter should be consulted.



