
PROTECTION – CONTROL – IDENTIFICATION – TRACKING

LEGHORNGROUP Ethic Code of Conduct

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LeghornGroup adopts this Ethic Code of Conduct in terms of quality and safety of its products, preservation of the environment and application of health and safety rules at work.

In a national and international environment characterized by an aggressive competition and a rapid evolution of the needs and expectations from our customers, the adoption of an environmental and social responsibility code is one important way of ensuring the sustainability and Growth of LeghornGroup and the effective implementation of our sustainable development strategy.

1. Overview

This document details LeghornGroup policies and directives guiding the Group Relationship with each other's and our stakeholders or partners.

LeghornGroup adopts this Ethic Code of Conduct in terms of quality and safety of its products, preservation of the environment and application of health and safety rules at work.

We expect from LeghornGroup employees:

- To commit to and comply with our Ethic Code of Conduct;
- To raise their hands in case of doubts;
- To speak in case of compliance breaches.

We expect from LeghornGroup managers:

- To lead by example;
- To encourage open discussions;
- To promptly resolve compliance breaches.

2. General provisions

This Code of Conduct sets out minimum conditions and standards to follow and adhere to assure an Ethical conduct.

The aim of this document is to ensure better implementation of our commitments to national and international standards, such as the United Nations Guiding Principles on Business and Human Rights, the core Conventions of the International Labor Organization (ILO) and the 10 principles of the United

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Nations Global Compact.

3. Human Rights

LeghornGroup commits to respect international human rights principles and the declaration of the International Labor Organization on fundamental principles and rights at work. Accordingly, LeghornGroup adheres to the following rules:

- Compliance with laws, including the Italian labor code, concerning remuneration and working hours.
- Prohibition of child labor: the minimum age for labor is 16, as provided by the Italian Labor Code and international laws and codes;
- Prohibition of all forms of forced or compulsory labor;
- Absence of any form of discrimination;
- Equal opportunity and treatment with respect, eliminating unacceptable behavior such as bullying, sexual harassment and discrimination;
- Respect of all employees and promotion of mutual respects among employees and with the management Team, keeping fair employment conditions, payment and working hours.
- Freedom of association for workers and the organization of trade unions;
- Provision of the necessary resources and means of security to prevent any infringement of human rights.

4. Health and safety at work

LeghornGroup is currently adopting an approach to health and safety at work in all its sites in accordance with the provisions of the current Legislation, applying the following safety rules:

- Guarantee of the health, safety and security of persons in the workplace;
- Adoption and / or implementation of a management approach in the areas of health, safety of personnel and fitness for work;
- Analysis of risks and occupational hazards, and appropriate precautionary measures against occupational accidents and diseases;
- Ensuring the necessary training and sensitization of staff on occupational health and safety measures and human rights.

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5. Environment

LeghornGroup is committed to the sustainable development of society; this means that development has to meet the needs of the present without compromising the ability of future generations to meet their own needs.

LeghornGroup gives a crucial importance to the management of the environment and the development of its environmental performance. LeghornGroup commits to comply with all applicable environmental legislation and demonstrates a continuous improvement in their environmental performance as follows:

- Analyzing the risks and environmental impacts related to the company’s activities;
- Minimizing any impact on the environment;
- Continuously improving the environmental protection;
- Ensuring compliance with legal and regulatory requirements for the environment;
- Taking necessary measures to prevent pollution;
- Increasing the awareness about sustainability among employees;
- Engaging our suppliers to ensure adequate sustainability standards.

6. Integrity and Confidentiality

LeghornGroup is committed to developing the principles of integrity and confidentiality in all its sites and its staff, adopting the following measures:

- Guarantee of impartiality, honesty and the absence of any form of corruption;
- Management of conflicts of interest;
- Respect of confidentiality of information received from its customers and partners, using our company assets;
- Ensure compliance at all times with applicable laws, rules and regulations.

7. Legality rating

The legality rating is a synthetic indicator of the compliance with high standards of legality for companies request it. They may apply for a rating which cumulatively meets the following requirements:

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- operational headquarters in Italy;
- minimum turnover of two million euros in the year preceding that of demand;
- registration in the business register for at least two years at the date of application;
- compliance with the other substantive requirements required by the Regulation.

This recognition takes the role of a score between a minimum of one and a maximum of three "stars".

The requesting company obtains the base score of a □ star, if it complies with all the requirements of Article 2 of the [Implementing Regulation on Legality Rating](#). The base score can be increased to a maximum score of three stars □□□.

The legality rating lasts two years from release and is renewable on request.

LeghornGroup managed to obtain a legality rating of two stars on November 24, 2020, thus showing the company's willingness to act ethically and in accordance with current regulations.

8. Responsibility of the Supplier

Suppliers of LeghornGroup are also encouraged to commit the necessary resources to meet the requirements defined in this Ethic Code of Conduct.

Signature

Federica Bolognesi

LeghornGroup CEO