GRUPPO CONCORDE
CERAMICHE

# CODE OF ETHICS
# GRUPPO CONCORDE

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## PREAMBLE

The Code of Ethics sets out the fundamental principles and values of all companies within the Gruppo Concorde, governing their day-to-day activities and their relationships with employees, customers, suppliers, partners, and all stakeholders.
Gruppo Concorde, as one of the leading industrial organisations in the global ceramic sector, pursues the continuous and ongoing improvement of its activities, measured not only in terms of economic performance, but also through the integrity and sustainability of the processes through which such results are achieved.
The solidity, reliability, and reputation of Gruppo Concorde are the cornerstone of our success and growth, as well as an integral part of our corporate culture. It is the individual responsibility of the people within Gruppo Concorde to preserve these values and their perception in the relationships each person maintains on behalf of the companies.
All those acting on our behalf, at any level and in any capacity, are required to comply with this Code of Ethics and to adopt conduct based on responsibility, loyalty, and integrity.

# I. THE GRUPPO CONCORDE

We represent a centre of excellence in the global ceramic sector and a benchmark in the production of ceramic surfaces for architecture. Our presence in international markets involves twelve companies operating with specific products and offerings, in addition to two companies engaged in the extraction and processing of raw materials. Each company has its own identity and addresses clients and designers worldwide with autonomous production, commercial, and marketing strategies.

## Addressees of this Code of Ethics

The Code of Ethics applies in all countries in which we operate and is addressed to all subjects who, in their respective roles, are involved in the activities of our Group. This includes employees, external collaborators, consultants and, more generally, all persons who, in any capacity, contribute to the achievement of our corporate objectives (hereinafter referred to as the “Addressees”).
The purpose of this Code of Ethics is to define, formalise and disseminate the ethical principles that guide our corporate actions and decision-making processes. Accordingly, compliance with such principles by the Addressees is essential for the proper functioning, reliability, and reputation of Gruppo Concorde The objective is to promote a shared culture of values that may serve as a guide for every decision and behaviour adopted by those operating within the corporate environment, at any level.

Furthermore, the adoption and compliance with the provisions of this Code of Ethics constitute an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001, adopted by the Italian companies of Gruppo Concorde.

## II. FUNDAMENTAL PRINCIPLES OF THE CODE OF ETHICS

**Honesty**

Honesty is the foundation for establishing relationships of trust and cooperation with all parties who, in various capacities, are involved in our work.
We are committed to acting with honesty and transparency, avoiding any deceptive or manipulative conduct. Accordingly, every person within Gruppo Concorde assumes responsibility for acting in a clear and truthful manner, both within and outside the organisation.

**Impartiality**

Impartiality is essential to create an inclusive and collaborative working environment, where everyone feels respected and heard; this approach is crucial to ensuring fairness and justice in our decisions and interactions.
The responsibility we assume on a day to day basis requires us to treat every individual with respect and without any form of discrimination, assessing them solely based on merit, proactivity, and integrity within the workplace.
At the same time, every person operating within our Group is required to maintain an objective and impartial approach, avoiding any conflict of interest.

**Transparency**

One of our constant principles, since the foundation of the Group to the present day, is to place people at the centre of our interests, basing our relationships on transparency in order to foster mutual trust, integrity, and accountability, aware that transparency ensures long-lasting relationships of trust with employees, suppliers, and customers.
Each collaborator is therefore required to interact with others in a clear, honest, and complete manner, to avoid misunderstandings and enable all parties to make informed decisions.

**Industrial Excellence and Continuous Improvement**

Industrial excellence and continuous improvement are values that distinguish us as a leading industrial organisation within the global ceramic sector. The willingness to face the future, with its opportunities and challenges, drives our growth path, based on continuous improvement and professionalism in both major and minor aspects of our activities.

## Quality of Products and Services

We recognise the importance of pursuing and maintaining a high-quality standard over time, in all products and services we offer. We strive for excellence in every project, promoting an entrepreneurial mindset oriented towards results and the responsible commitment of each collaborator.

At the same time, we acknowledge that customer satisfaction is fundamental to our success and market reputation. For this reason, we are all committed to exceeding customer expectations by providing reliable, innovative, and high-value services.

We encourage and reward proactivity, as well as the willingness to experiment with new solutions and alternative approaches.

## Environmental Protection – Environmental Responsibility

In accordance with the principle of environmental responsibility, we are firmly committed to protecting the environment, recognising the importance of adopting sustainable practices to ensure the safeguarding of natural resources for future generations.

Our commitment to limiting the environmental impact of our processes extends across the entire supply chain, from the extraction of raw materials to the shipment of the finished product.

We expect every member of our Group to contribute to this objective by taking environmental aspects into account in daily decision-making and by promoting responsible behaviour both within and outside the organisation.

Our objective is to provide customers with products that are safe in use and processing, and environmentally sustainable.

## Confidentiality Protection

We consider confidentiality to be a fundamental value of our Group and a key element in maintaining trust with our employees, customers, and partners. Therefore, we are committed to protecting and carefully handling all sensitive and confidential information obtained during our activities.

At the same time, each collaborator must manage corporate information with due care, to preserve the competitive advantage already achieved or potentially deriving from research activities, knowledge, and know-how, as well as the personal data of customers and colleagues.

It is also strictly prohibited to disclose, use, or share confidential information without authorisation and in a manner not compliant with applicable laws and regulations.

**Compliance with Laws and Regulations**

We are committed to operating at all times in full compliance with all applicable laws and regulations in each country in which the Group operates, requiring all collaborators of Gruppo Concorde to act accordingly with the utmost diligence.

**Fairness in Case of Potential Conflicts of Interest**

We consider it essential, in the performance of any business-related activity, to avoid situations in which the individuals involved are—or may even appear to be—in a conflict of interest.

This includes both cases where a recipient of this Code pursues personal interests in conflict with those of the Group or with the balance of stakeholders' interests, and cases where representatives of customers, suppliers, or public authorities act in a manner incompatible with the fiduciary obligations arising from their role.

**Responsibility and Commitment**

We believe that an effective team is composed of diverse personalities and skills that respect one another and collaborate towards the achievement of a common objective.

Each of us therefore has a duty to engage with others and to contribute value to our Group: colleagues, suppliers, customers—no one excluded.

Our career paths are numerous and structured in such a way that everyone may find the most suitable path for their aptitudes. To this end, we encourage the continuous development of professional skills and knowledge, so that each individual may actively contribute to the achievement of corporate objectives, promoting a culture of responsibility and commitment, where everyone is aware of the importance of their role and the impact of their actions on the collective success of the Group.

**Protection of Intellectual Property Rights**

We recognise the importance of protecting intellectual property rights. We are committed to complying with all applicable laws and regulations in this area, avoiding the improper or unauthorised use of ideas and creations belonging to others.

Each collaborator is required to respect intellectual property rights, promoting innovation in an ethical and transparent manner. Our aim is to create an environment in which creativity and talent are protected and respected, thereby contributing to a fair and responsible working environment.

## III. RELATIONS WITH EMPLOYEES AND COLLABORATORS

We have always consistently placed people at the centre of our priorities: we believe that human resources represent the true asset of the organisation and our primary factor of success.
We therefore pay particular attention to the enhancement, protection, and development of the skills and competencies of all collaborators, so that they may fully express their potential and professionalism and, consequently, contribute to the achievement of established objectives, in compliance with the social and environmental responsibility commitments defined by management.
We offer equal employment opportunities to all individuals, based on their respective professional characteristics and performance capabilities, without any discrimination. We condemn any conduct against individual personality that is contrary to our principles and adopt the most appropriate monitoring measures for this purpose.
Accordingly, in compliance with all applicable laws, regulations, and company policies, we undertake to:

- select, hire, remunerate, train, and evaluate individuals based on merit, such as; commitment, competence, professionalism, and achieved results, without any discrimination on political, trade union, religious, racial, language, or gender grounds;
- respect and protect the physical and cultural integrity of every individual, ensuring a safe working environment and one that respects human dignity. We promote the enhancement of cultural, intellectual, and personal diversity, rejecting any form of violence, discrimination, or exploitation. Any form of forced labour, compulsory labour, or child labour is strictly prohibited, with “child labour” understood as work performed below the minimum age established by applicable law, both within Group facilities and at stakeholders’ premises;
- support our collaborators by strengthening their sense of belonging to the Group. Such support is also extended to aspects of private life, for example through subsidised rates for “Asilo Concorde” (Concorde Kindergarten) or other selected childcare facilities, as well as bonuses for special occasions;

- foster ambition, proactivity, and opportunities for professional advancement. To this end, we provide employees with training programmes aligned with individual development needs, to help individuals realise their potential and develop their skills;
- oppose any form of intimidation, hostility, isolation, undue interference, coercion, or sexual or any other form of harassment;
- ensure that, within a framework of reciprocal rights and duties, employees are guaranteed the possibility to express their personality and are afforded reasonable protection of their privacy in both personal and professional relationships;
- take action in the event of conduct that does not comply with the above principles.

**Personnel Selection**

We are firmly convinced that undertaking a career within Gruppo Concorde means joining a solid and reliable industrial organisation from an industrial, economic, financial, and asset standpoint, committed to ensuring the professional growth of all individuals working for the Group.

The cornerstone of our working environment is the reward of merit, proactivity, and fairness. We assess prospective employees—both in Italy and abroad—based on the alignment between candidates' profiles and the required job specifications and business needs, in compliance with equal opportunity principles. The information requested is strictly related to the verification of professional and psycho-attitudinal requirements, while respecting the candidate's private sphere and opinions.

**Establishment of the Employment Relationship**

We hire personnel under formal employment contracts; we do not tolerate any form of irregular employment.

Upon commencement of the employment relationship, each employee receives accurate information regarding:

- the characteristics of their role and duties;
- the legal and remuneration elements, as regulated by the applicable national collective labour agreement;
- rules and procedures to be adopted to prevent health and safety risks associated with the work activity, as communicated by the Head of the Prevention and Protection Service;
- the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001, including this Code of Ethics.

# IV. RELATIONS WITH EXTERNAL STAKEHOLDERS

## A) Suppliers

We consider our suppliers a primary source of competitive success. Accordingly, supplier selection is based on principles such as integrity, confidentiality, and responsibility—shared values—towards the environment and people. Relationships established with suppliers are managed not only in full compliance with applicable laws, but also in accordance with principles of fairness and loyalty.

In light of these principles, Gruppo Concorde operates in accordance with the following standards:

- adopt a supplier selection and qualification process based on objective criteria, with particular attention to technical, financial, organisational and ethical aspects, always ensuring the best interests of our Group;
- foresee and encourage regular monitoring activities regarding the quality of purchased goods and services, as well as delivery times;
- manage correctly any cases of non-conformity of goods and/or services received with contractual standards, and more generally any failure by suppliers to comply with contractual obligations;
- require all suppliers to comply with all relevant regulations, with particular reference to health and safety and environmental protection;
- require adherence to the principles of the Code of Ethics and the Supplier Code of Conduct, reporting to the Supervisory Body any conduct by a supplier that appears inconsistent therewith;
- not maintain any form of relationship with suppliers that make use of irregular forms of employment or operate in breach of immigration legislation;
- take corrective actions aimed at ensuring alignment with the principles set forth above, where a supplier adopts conduct not compliant with the Code of Ethics and/or the Supplier Code of Conduct.

**B) Customers**

We believe that customer satisfaction is fundamental to our success and reputation in the market and, for this reason, we are collectively committed to exceeding customer expectations by providing a reliable, innovative and high-value service.
To this end, we encourage and reward proactivity and the willingness to experiment with new solutions and alternative approaches, in accordance with our values.
A fair and transparent relationship with customers and suppliers represents a fundamental aspect of our success, which must be pursued by offering high-quality services under competitive market conditions and in compliance with the rules of fair competition.

**C) Public Authorities and Public Administrations**

We require that all relationships with public officials, persons in charge of a public service acting on behalf of Public Administrations, legislative bodies, European Union institutions, international public organisations and any foreign State, as well as with the judiciary, public supervisory authorities and other independent authorities, and with private entities acting as concessionaires of public services, are established and managed with the utmost respect for applicable laws and regulations, the principles set forth in the Code of Ethics, and our internal procedures, so as to preserve the integrity and reputation of both parties.
The highest level of diligence must always be maintained in relations with the aforementioned parties, in particular in connection with operations relating to: contracts, authorisations, licences, concessions, applications and/or management and use of any form of public funding (national or EU), social security institutions, tax collection bodies, authorities involved in insolvency proceedings, civil, criminal or administrative proceedings, access to and use of IT or telematic systems and data, as well as electronic documents.

# V. OTHER RULES OF CONDUCT

## Use and Protection of Company Assets

Each internal stakeholder is responsible for the use and safekeeping of the assets provided by Gruppo Concorde for the performance of their duties and is required to act with due care to protect them, adopting responsible behaviour consistent with the applicable internal procedures.

In particular, internal stakeholders:

- may not carry out, during working hours, activities that are unrelated or not consistent with their duties and organisational responsibilities, and must use company resources exclusively for purposes connected with and instrumental to the performance of their work activities;
- must act with the utmost diligence and in an appropriate manner, also in order to prevent harm to persons or property and to reduce the risk of theft, damage or other external threats to the resources assigned or present within the company;
- must avoid, as far as possible, waste, tampering or use of company resources that may compromise their efficiency or accelerate their normal deterioration;
- must strictly avoid (except where otherwise provided by specific regulations) the use or transfer of company assets to third parties, even on a temporary basis.

## Conflict of Interest

In the performance of any activity, there is a strict obligation to avoid situations of actual or even potential conflict of interest. All decisions taken and business choices made on behalf of Gruppo Concorde must correspond to the Group's best interests, in full compliance with applicable law.

Stakeholders, even outside the activities carried out for the Group, must not engage in conduct that may constitute a conflict of interest and/or competition with Gruppo Concorde,

or that may interfere with their ability to perform their duties impartially and in the interest of the Group.
They are required to refrain from personally benefiting, directly or indirectly, or through third parties, from business opportunities of which they become aware while performing their duties.

**Gifts and Hospitality Management**

It is not permitted to give or receive any form of gift or benefit (understood as any type of advantage) that could even be interpreted as exceeding normal courtesy practices or as aimed at obtaining preferential treatment in the conduct of any activity related to the Group. Particularly, any form of gift or benefit to Italian or foreign public officials, or to their family members, which may influence their independent judgement or induce them to secure any advantage, is strictly prohibited.
The management and control of gifts and hospitality, whether received or given, involving employees of each Group company, is delegated to the Chief Executive Officers of the relevant company.

**Occupational Health and Safety**

The objective of Gruppo Concorde is to ensure a working environment free from risks to health and safety, and to protect its people, continuously seeking the necessary synergies not only within the Group companies, but also with suppliers, contractors, partners and customers involved in its activities.
To this end, the personnel involved in such processes shall base their activities on the following fundamental principles:

- implementation of a Health and Safety Management System compliant with ISO 45001 standards;
- assessment of all risks to health and safety and adoption of a systematic approach to eliminate them at source or, where this is not possible, to minimise them; also taking into account the effects that an organisation of work unable to ensure an adequate work–life balance may have on employees' psycho-physical well-being;
- adoption of the best available technologies and working methods oriented towards continuous improvement;
- implementation of an ongoing information and training programme for workers.

All personnel of Gruppo Concorde are required to comply with the initiatives and instructions resulting from the above activities. Proactive contribution to the dissemination of a safety culture and reporting of residual risks is encouraged.

## Personal Data Management

We are fully committed to complying with all applicable data protection laws, with specific reference to the GDPR and the provisions issued by the Italian Data Protection Authority, by defining appropriate procedures that are continuously updated and/or adopting adequate security measures.

All Recipients are required to maintain the strictest confidentiality—refraining from disclosing information—regarding documentation, projects, know-how and, in general, all data and information acquired in the course of their employment within the Group.

Accordingly, in the processing of information, the following is required:

- to carefully store and maintain the utmost confidentiality of all information acquired in the performance of their duties, also to protect the know-how developed by Gruppo Concorde;
- to request, where required by data protection legislation (EU Regulation No. 2016/679 and Legislative Decree No. 196 of 30 June 2003, as amended by Legislative Decree No. 101 of 10 August 2018), consent for the processing of personal data, and to use such data exclusively for the purposes provided for and in compliance with the security measures adopted by Gruppo Concorde;
- to comply with internal procedures specifically designed to prevent misuse of privileged and confidential information;
- to act in accordance with the principles set out in the Privacy Code and avoid any unlawful processing of personal data, in particular special categories of data.

## Competition

We recognise that fair and loyal competition is a fundamental condition for the development of business activity and we are committed to full compliance with the applicable rules governing it.

All Recipients of this Code of Ethics are expressly prohibited from engaging in any practice (e.g. cartel formation, market allocation agreements, conditional agreements, etc.) that restricts competition or unlawfully distorts the sector of operation, even where such practice is not intended as such but may be deemed so by an impartial third party.

They are equally required to strictly comply with competition law by avoiding any contact with competitors concerning sensitive commercial information such as prices, volumes, etc. Furthermore, if they become aware of conduct by third parties in breach of antitrust rules, they must immediately report it to their line managers and to the Supervisory Body of their respective company.

## Commitment to the Community and Management of Sponsorships and Contributions to Associations and Organisations

We encourage and promote commitment to the community: we are active in the social sphere through programmes providing concrete support to families and local communities. For

example, we make significant contributions to hospitals, healthcare and social care facilities, and associations working to combat economic and social hardship.
The granting of sponsorships and contributions stems from our commitment to fostering close cooperation with local communities in the areas where we operate, aimed at the continuous improvement of their socio-economic conditions and of our presence in the territory, together with the effective achievement of business objectives.
We also promote numerous initiatives involving universities and schools, including donations, scholarships for Master's degrees, awards, paid internships, and training activities.
In the management of sponsorships and contributions to associations and organisations, we are committed to operating within a framework of fair competition, honesty, integrity, fairness and good faith with respect to the legitimate interests of all individuals and local communities interacting with our Group.
Any sponsorships or contributions are managed in accordance with the principles of the Code of Ethics and internal company procedures. The authorisation, management and monitoring phases of expenses related to sponsorships, initiatives and contributions are always guided by reasonableness, appropriateness and adequacy, and are duly traceable and formalised.

## VI. WHISTLEBLOWING

In compliance with the regulatory provisions introduced by Legislative Decree No. 24/2023, we have adopted a whistleblowing reporting management system common to all Companies of the Group. The following constitute reportable violations:

- administrative, accounting, civil and/or criminal offences;
- offences relevant under Legislative Decree No. 231/2001;
- violations of the Group Code of Ethics and of the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/01 adopted by the individual companies of the Group;
- offences falling within the scope of application of European Union or national acts relating to the following sectors: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and personal data, and security of network and information systems;
- acts or omissions affecting the financial interests of the Union;
- acts or omissions concerning the internal market.

Reports may be submitted through the following Internal Channels:

- in writing: via a dedicated whistleblowing IT platform named "Wallbreakers", accessible through the website www.gruppoconcorde.it/.
  - A dedicated section is provided for each Italian company of the Group subject to the obligation to establish an internal reporting channel;
- verbally: via the telephone channel integrated into the IT platform, accessible by calling the number 05 360 40210.
  - The telephone line is shared by all Italian companies of Gruppo Concorde required to implement a whistleblowing procedure; therefore, the reporting person must indicate the specific company concerned by the report;
- by ordinary mail addressed to: Gruppo Concorde S.p.A. – Registered and Administrative Office, Via Canaletto, 141, 41042 Spezzano di Fiorano (MO), Italy.

The management of internal reporting channels is partly entrusted to Warrant Hub S.p.A. – PrivacyLab Business Unit, an independent entity specifically trained and formally appointed as Data Processor (hereinafter also the "Manager"), and partly entrusted to a Committee (hereinafter also the "Manager") called the Whistleblowing Committee, composed of the Head of Human Resources, the Head of Information Systems and the Chief Financial Officer of Gruppo Concorde, duly authorised to perform this role and specifically trained.
For further details, please refer to the extract of the Whistleblowing Policy available at: https://www.gruppoconcorde.it/whistleblowing/

## VII. DISCIPLINARY SYSTEM

Failure to comply with the obligations set out in this Code of Ethics may result in the application of sanctions, in accordance with the Disciplinary System adopted by the Companies of our Group.
The disciplinary system is based on the following principles:

- differentiation of sanctions according to the personal characteristics of the recipients (Employees, Managers, Third Parties, etc.);
- differentiation of the severity of sanctions in relation to the seriousness of the facts, their possible repetition, and the damage caused to Gruppo Concorde;
- provision of specific sanctions in the event of negligence or lack of due diligence in identifying or remedying breaches of the Model or the Code of Ethics.

For further information regarding disciplinary measures and procedures, reference is made to the Disciplinary System contained in the General Part of the Organisation, Management and

Control Model pursuant to Legislative Decree No. 231/2001 adopted by the Companies of the Group.

## VIII. APPROVAL OF THE CODE OF ETHICS AND AMENDMENTS

Updates and revisions of the Code of Ethics are defined and approved by Gruppo Concorde S.p.A., considering contributions received from employees and third parties, regulatory developments and international best practices, as well as the experience gained in the application of the Code itself.
The Code of Ethics is available for consultation by employees through the company's internal portal and is also accessible to all Recipients via the institutional website where it is published.

**How to behave in case of uncertainty**

The Code of Ethics cannot provide specific recommendations for every situation. When we are uncertain or feel particularly under pressure whilst decision making, we should ask ourselves the following questions:

- am I behaving correctly?

- is what I am doing lawful?
- am I complying with the values and principles of the Gruppo Concorde Code of Ethics?
- is my behaviour aligned with company procedures?
- would I be comfortable if my actions were made public?

If the answer to even one of these questions is “No”, or if there is any doubt regarding the lawfulness of an action or the application of a principle of the Code of Ethics, a policy or a standard of conduct, we must stop and seek advice through the appropriate channel.
Raising doubts and asking questions helps us manage situations correctly and resolve potential issues.