

A close-up photograph of a human hand holding a single, clear water droplet. The hand is positioned above a small, vibrant green seedling that is growing out of a mound of dark, rich soil. The background is a soft, out-of-focus green, suggesting a natural, outdoor setting. The overall image conveys themes of care, growth, and nurturing.

CODE OF ETHICS AND CONDUCT



**CARTOGRAFICA
VENETA** S.p.A.

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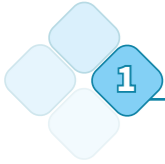
GENERAL PRINCIPLES



success
health
loyalty
power
fairness
empathy
vision
honesty
stability
curiosity
trust
credibility
integrity
fitness
beauty
balance
devotion
humor
excellence
order
growth
kindness
efficiency
flexibility
significance
wisdom
family
knowledge
compassion
freedom
cooperation
determination
joy
truth
confidence
challenge
mindfulness

CORE VALUES

creativity
experience
mastery
optimism
courage
passion
spirituality
self-reliance
generosity
control
tenacity
enthusiasm



1.1. Social Responsibility Management System Policy

CARTOGRAFICA VENETA S.p.A., aware of the benefits associated with adopting socially responsible behavior, has decided to implement an appropriate Social Responsibility Management System across all its activities, with the primary goal of contributing to sustainable development.

The Social Responsibility Management System is based on **CARTOGRAFICA VENETA S.p.A.**'s commitment to promoting the principles of social responsibility as defined by the SR 10 Social Responsibility Management Systems standard:

- Accountability for activities and decisions towards its stakeholders;
- Transparency and ethical behavior;
- Respect for the interests of stakeholders;
- Adherence to the principles of legality, international standards of behavior, and human rights.

The general objectives pursued by **CARTOGRAFICA VENETA S.p.A.** through its Social Responsibility Management System are:

- To comply with the requirements established by the SR 10 standard as well as any other social responsibility requirements that may be subscribed to;
- To be accountable for the relevant environmental impacts associated with its activities and decisions;
- To clearly and comprehensively disclose information related to the activities and decisions for which it is responsible;
- To pursue honesty, fairness, and integrity in the implementation of its activities and decisions;
- To respect, consider, and respond to the interests of its stakeholders;
- To comply with all applicable legal requirements and national and international standards of conduct;
- To continuously improve its Social Responsibility Management System;
- To consider the expectations of local communities, customers, employees, suppliers of goods/services, environmental associations, and, in general, all qualified stakeholders, assessing the social impacts that corporate decisions might have on all these subjects and ensuring a

two-way communication system, access to information, and the submission of observations and complaints;

- To make its principles of environmental protection and respect the foundation for ensuring its success in the market;
- To ensure compliance with all existing national and community regulations regarding accident prevention, also considering technical standards and international standards.

CARTOGRAFICA VENETA S.p.A. also intends to ensure full respect for human rights protection principles through the following commitments:

- commitment to not use child labour, while simultaneously refusing any form of collaboration with individuals, companies, entities, and organizations (including the entire supply chain) that do not exclude the employment of personnel who have not fulfilled their compulsory schooling;
- Commitment to not resort to or support the use of forced and compulsory labor, while simultaneously refusing any form of collaboration with individuals, companies, entities, and organizations (including the entire supply chain) that do not exclude the employment of personnel under such labour conditions;
- Commitment to ensure a safe and healthy working environment to protect the physical and psychological well-being of its workers and those in the entire supply chain (including through appropriate audit methods);
- Commitment not to restrict in any way the right of workers to form, participate in, or organize union activities or other types of associations;
- Commitment to employ human resources solely based on their aptitudes and skills, avoiding all forms of discrimination and also promoting training and development programs;
- Commitment to ensure the dignity and respect of workers, including but not limited to, opposition to severe or inhumane punishment and treatment, recognition of appropriate economic treatment, and provision of tools and schedules that ensure work-life balance;
- Commitment to comply with the limits set by current environmental legislation regarding relevant environmental aspects;
- Commitment to progressively reduce and prevent the environmental impact resulting from its activities;
- Commitment to raise awareness among suppliers on issues related to quality, environment, and safety and to adopt measures to encourage them to implement quality, environment, and safety management systems;
- Commitment to continuously train, inform, and raise awareness among all personnel so that they are always in the best condition to perform their tasks safely.

This Policy is documented, implemented, maintained, communicated, and made accessible to company personnel and all interested parties. It is a public document that is periodically verified and reviewed to consider any changes that may have arisen over time, such as those related to current legislation or the requirements of the corporate code of conduct.

Lonigo, 11/06/2024

The Management

1.2. The Values of Cartografica Veneta

Cartografica Veneta’s commitment lies in creating value for all stakeholders involved in its activities, aware that success depends on understanding laws and adhering to values such as Responsibility, Respect, Collaboration, Determination, and Pride, without forgetting Honesty, Legality, Impartiality, and Transparency. These principles guide a solid economic performance and excellence in social and environmental management. At Cartografica Veneta, adherence to these values is reflected in obtaining and maintaining various certifications that attest to the quality of products as well as the company’s commitment to the environment and people throughout all phases of the lifecycle.

The certifications held by Cartografica Veneta are:

- BRC Global Standard
- FSC® Certification
- PEFC Certification
- UNI EN ISO 9001
- UNI EN ISO 14001
- UNI ISO 45001



1.3. Purpose of the Code of Conduct

Cartografica Veneta has created this Code of Conduct to serve as a guide for all involved parties: employees at all levels, partners, distributors, consultants, experts, agents, and other intermediaries, as well as anyone with whom the company has business relationships.

Everyone is required to know, apply, and comply with this Code. For employees, this Code of Conduct is considered incorporated into the employment contract. Compliance or non-compliance is associated with the internal disciplinary mechanisms defined by Cartografica Veneta. These mechanisms will be applied in case of violations of the duties and prohibitions provided in this Code, without prejudice to any other liability that may arise from the breach of these rules.

Each of these actors must take personal responsibility for adhering to this Code. This responsibility extends to all levels of the corporate hierarchy and to the directors.

1.4. Scope and Recipients of the Code

The Code of Ethics, approved by the Company’s Board of Directors, is addressed to the directors, managers, and employees of Cartografica Veneta S.p.A., as well as all those who operate permanently or temporarily on behalf of the Company (hereinafter referred to as “Recipients”).

Recipients are required to comply with the provisions of this Code of Ethics for the entire duration of their relationship with the Company and their contractual commitments with it.

Members of the Board of Directors are guided by the values and principles of this Code of Ethics in the exercise of their activities.

The members of the Board of Directors are required to take into account the principles of the Code of Ethics when setting the company’s objecti-

ves, proposing and implementing strategies, investments, and projects.

Top management of the company must adhere to the contents of the Code of Ethics when developing processes, proposing, and implementing activities and actions necessary to achieve the company’s objectives.

Employees must be inspired by the Code of Ethics in their work activities, adjusting their behaviour and actions in addition to complying with the law and current regulations.

Collaborators not bound by any subordination to Cartografica Veneta S.p.A., as well as commercial partners involved in business relationships with the company, are required, in their various interactions with Cartografica Veneta S.p.A., to align their behaviour with the provisions of the Code of Ethics.

The Code of Ethics is valid both in Italy and abroad, considering the cultural, social, and economic differences of the various countries in which the company operates.

1.5. Compliance with Legal and Other Requirements

All operations, activities, and relationships of Cartografica Veneta are guided by respect for the law and other subscribed requirements, framed within an organizational culture that respects and protects human rights, promotes open communication with all stakeholders, and is oriented towards continuous improvement.

Laws, regulations, and contractual conditions are subject to changes that may require revisions of this Code. All personnel must stay duly updated on any amendments to the Code and adhere to them regardless of whether such changes have been reflected in previous versions.



CONDUCT CRITERIA

2



2.1. Relations with Stakeholders

2.1.1 Management of Information

All personnel of Cartografica Veneta are required to protect and safeguard the confidentiality of information acquired during their work activities, which cannot be disclosed or used for personal or third-party gain without the express authorization of the owning company. This obligation also extends to external stakeholders and the recipients of this Code.

Therefore, each involved party must:

- Acquire and handle only the information and data necessary and directly related to their work activities;
- Safeguard such data and information to prevent unauthorized third parties from accessing it;
- Communicate and disclose data/information only within the procedures established by the company and with prior authorization from the same.

- Evaluate and determine the confidential and reserved nature of information according to the procedures set by the data-owning company;
- Observe confidentiality obligations even after the end of the relationship with the company, in accordance with current regulations and/or previously assumed contractual commitments.

Confidential information includes, but is not limited to:

- Company projects.
- Market strategies.
- Distribution and sales models.
- Negotiations with suppliers and clients.
- Projects, specifications, and product compositions.
- Plans for machinery, other engineering components, and production processes.
- Sensitive employee information.
- Financial information that is not public.

2.1.2 Gifts, Presents, and Benefits

Offering gifts or free services to third parties during the employment relationship must be considered and evaluated with the utmost caution. If they fall within the norms of interpersonal relations, they must remain within reasonable limits and have symbolic value.

In particular, any type of gift that could influence judgment or induce the assurance of any advantage for the company is prohibited.

Administrators, top management, and employees are allowed to accept gifts or other forms of courtesy from third parties who are or may potentially be in a relationship with the company, within the bounds of normal courtesy and only if of modest value. It is prohibited to accept gifts in the form of money or items easily convertible into money. If a gift does not meet these criteria, it must be politely refused.



2.2. Relations with Collaborators and Employees

2.2.1. Personnel Selection and Employment Relationship

Personnel evaluation is carried out with respect to equal opportunities for all interested parties. The function responsible for personnel management, within the limits of available information, adopts appropriate measures to avoid favouritism, nepotism, or forms of clientelism during the selection and hiring phases.

Personnel is hired with a regular employment contract, and no form of employment that is not in compliance with current legal standards and applicable national collective labour agreements is tolerated.

At the establishment of the employment relationship, each collaborator receives information about the characteristics of the function and duties to be performed, normative and remuneration elements, and the rules and procedures to be followed.

2.2.2. Professional Growth

Cartografica Veneta is committed to developing the skills, competencies, and potential of each employee. The company provides equal employment opportunities to all workers, ensuring that everyone receives fair treatment based on merit, without any form of discrimination.

The responsible managers must:

- Adopt merit-based, competency-driven, and strictly professional criteria for any decisions related to an employee;
- Manage employees without any form of discrimination;
- Create a work environment where personal characteristics do not lead to discrimination.

The company expects employees, at all levels, to cooperate in maintaining a climate of mutual respect for the dignity, honour, and reputation of everyone.

2.2.3. Dignity of the Person and Human Rights

Cartografica Veneta respects and promotes the dignity of individuals, regardless of differences in origin, religion, ethnicity, gender, political ideology, disability, age, or sexual orientation.

Cartografica Veneta is committed to safeguarding the moral integrity of employees and collaborators by ensuring the right to working conditions that respect personal dignity and by preventing harassment, intimidation, sexual or personal offenses, or hostile behaviour, whether verbal, written, physical, or psychological.

At the same time, Cartografica Veneta does not engage in behaviours or make choices that undermine the right to equal opportunities.

Cartografica Veneta does not accept forced or involuntary labour, nor child labour. Specifically, this means:

- Treating all employees and people in general with humanity, dignity, and respect.
- Supporting employees' freedom of association.
- Promoting professional growth of employees.
- Providing continuous and constant training and development plans for work teams.
- Ensuring fair economic treatment and guaranteeing a decent salary.
- Combating forced labor.

Cartografica Veneta is committed to observing national, European, and international regulations protecting individual personality rights.





2.2.4. Health and Safety at Work

Human resources are recognized as a fundamental and indispensable factor for the company's development. Cartografica Veneta protects professional growth and development to enhance the knowledge base while respecting current regulations regarding individual personality rights, with particular attention to the moral and physical integrity of employees and collaborators.

Personnel is hired based on regular employment contracts, and no form of irregular labour is tolerated. The candidate must be informed of all the characteristics related to the employment relationship. Salary increases or incentive systems, as well as access to higher positions or roles (promotions), are based not only on laws and collective labor agreements but also on individual employee merits.

Cartografica Veneta is committed to avoiding favouritism and nepotism and, furthermore, to hiring non-EU foreign citizens only if they possess a valid residence permit or have requested its renewal within the legal deadlines.

Cartografica Veneta undertakes all necessary activities to prevent environmental risks and ensure safety and health at work, in compliance with current regulations.

In this regard, Cartografica Veneta seeks to promote safe and healthy work environments that contribute to the well-being of employees. A management system is implemented to identify, correct, and report workplace incidents and injuries, as well as risks associated with routine and extraordinary activities.

All personnel are required to be aware of, implement, maintain, and improve all initiatives aimed at ensuring a healthy and safe work environment to protect the well-being of other employees, visitors, contractors, and the public.



2.2.5. Privacy Protection

The company guarantees full compliance with legal requirements regarding the confidentiality of personal data and privacy protection, adopting the standards provided by law (Legislative Decree 196/2003 and subsequent amendments) for data processing.

With reference to the processing of employees' personal data, the company implements specific precautions to inform them about the nature of the personal data being processed, the methods of processing, and the areas of communication.

Recipients are required to implement all the prescribed measures and precautions and not to use the data for purposes unrelated to the exercise of their assigned activities.

2.2.6. Protection and Use of Company Assets

Company assets consist of both tangible assets (e.g., computers, printers, equipment, vehicles, real estate, infrastructure) and intangible assets (e.g., projects, plans, patents, strategies).

The preservation of assets is a fundamental value for safeguarding corporate interests.

Recipients, in the performance of their business activities, must protect company assets and prevent fraudulent or improper use.

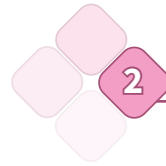
The use of company assets by recipients must be functional and exclusive to the performance of business activities or purposes authorized by the responsible managers.

2.2.7. Use of Information Systems

Cartografica Veneta S.p.A. adopts information system management policies to ensure the security of applications, data, and equipment.

Recipients are required to:

- Respect and apply these policies, with particular but not exclusive reference to the management and protection of system access passwords;
- Not unlawfully duplicate software and applications installed on the systems;
- Not install software systems or applications without prior authorization from the designated functions;
- Not access information systems without prior authorization from the responsible company functions;
- Not engage in behaviors that could jeopardize the security, integrity, or usability of the data.



2.3. Relations with Third Parties and Due Diligence

2.3.1. Customers

Cartografica Veneta S.p.A. bases its business relationships and communications with its customers on the principles of fairness, professionalism, and transparency.

The behaviour of employees and all company collaborators towards customers must adhere to these principles and be aimed at providing high-quality products and services that meet their reasonable expectations and needs.

Cartografica Veneta S.p.A. is committed to not arbitrarily discriminating against its customers. Contracts and communications must be clear, simple, complete, and compliant with current regulations.

To protect the customer, Cartografica Veneta S.p.A. does not tolerate the use of misleading and untruthful advertising tools.

Recipients are required to adhere to these principles in their dealings with customers.

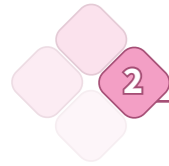
2.3.2. Suppliers

Loyalty and impartiality, alongside compliance with applicable legislation, are the fundamental principles on which Cartografica Veneta bases its choice of suppliers. The processes for evaluating, qualifying, and selecting suppliers are aimed at finding the best balance between economic advantage and product/service quality.

In procurement and, in general, in the supply of goods and/or services, it is mandatory to:

- Observe internal procedures for the selection and management of supplier relationships;
 - Not exclude any interested company, that demonstrates meeting the required criteria, from competing for a supply by adopting objective and documentable evaluation criteria, according to declared and transparent methods;
 - Comply with contractually agreed conditions, maintaining an open and honest dialogue with suppliers, in line with good commercial practices.
 - Verify that suppliers have adequate resources, including financial means, structures, and capabilities to meet the company's needs.
- Compliance with labour law, health, and safety regulations by the supplier is considered an essential and non-negotiable element in the supplier relationship.





2.4. Relations with the Community and the External Environment

2.4.1. Environment

Environmental sustainability is one of Cartografica Veneta's strategic goals. In this perspective, natural resources are used judiciously, aiming to minimize the environmental impact of all production processes and activities.

All employees and external collaborators who work directly or on behalf of Cartografica Veneta are required to respect relevant legislation and the natural environment, and to continuously seek to improve their performance in carrying out their duties and every aspect of their work.

For further information, the environmental policy statement is available and can be consulted.

2.4.2. Anti-Corruption

Cartografica Veneta is committed to adhering to all national and international anti-money laundering laws and regulations.

The commitment to combating corruption and the related control activities extend to every business relationship and transaction of the company.

Therefore, CARTOGRAFICA VENETA S.P.A. does not condone any form of corruption or the exchange of any form of bribe.

Personnel and collaborators of Cartografica Veneta must not, under any circumstances, receive or accept promises of cash payments or risk being involved in matters related to the laundering of money from illegal or criminal activities.

Before establishing relationships or entering contracts with non-occasional suppliers and other long-term business partners, Cartografica Veneta ensures the moral integrity, reputation, and good name of the business counterpart.

2.4.3. Political Neutrality

Cartografica Veneta believes in democracy, institutions, and the values they represent and maintains a politically and ideologically neutral stance. For this reason, it does not actively participate in or support political campaigns or political parties.

While direct participation in political activities is not anticipated, Cartografica Veneta reserves the right to engage in debates on issues of legitimate interest that involve the organization, employees, and stakeholders.

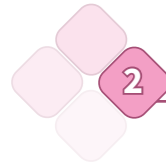
However, this does not detract from support for individuals' right to participate in civic and political activities.

2.4.4. Fair Competition

Cartografica Veneta believes in the importance of ethical business conduct and free competition: for this reason, it competes fairly and in compliance with applicable antitrust laws. The company recognizes that market advantage is achieved solely through the provision of excellent products and services. Those who work for Cartografica Veneta or on its behalf are required to be familiar with and strictly adhere to the rules of fair and healthy competition in all decisions and actions taken in the course of their work.

Cartografica Veneta rejects any act or agreement that limits free competition, such as, by way of example but not limited to, price manipulation, customer or market allocation, abuse of a dominant position, or any other situation that might constitute a monopolistic regime. Similarly, it opposes any other behavior that results in unfair competition.





2.4.5. Conflict of Interest

A conflict of interest refers to any situation, even a potential one, where the specific advantage of an individual conflicts with the goals of the company.

All personnel and stakeholders involved with Cartografica Veneta are required to avoid any situations or activities where a conflict with the company's interests might concretely arise, or that might interfere with their ability to make impartial decisions in the best interest of the company and in full compliance with the provisions of this Code. They must also refrain from deriving personal benefit from the management of company assets or business opportunities they become aware of in the course of their duties.

In the event that a situation arises that may generate a conflict of interest, the involved individual must promptly report it to their direct superior in the hierarchy and to the company's compliance committee, which will jointly determine measures to eliminate or mitigate such a conflict.

If the involved individual holds a senior role, they must also:

- Refrain from exercising their decision-making role and delegate such role to others designated by the company's organization;
- If such abstention/delegation is not possible, involve other parties in the decision-making process to provide greater transparency.

Failure to report the existence of such conflicts constitutes a violation of this Code.

2.4.6. Charity and Sponsorships

Cartografica Veneta may consider contributions limited to proposals from non-profit organizations, provided they present high cultural, charitable, or social value. Sponsorship activities, potentially related to sports, environmental, cultural, or artistic themes, can only be directed towards initiatives proposed by credible entities that exhibit quality and originality. In any case, the company,

In evaluating proposals to support, attention is given to any potential conflict of interest. Requests for contributions or sponsorships must be authorized by the company's top management in compliance with current company procedures.

2.4.7. Accounting Transparency and Financial Data Recording

Cartografica Veneta adheres to standard accounting practices and policies and is required to prepare and maintain books, records, and statements that accurately and faithfully reflect the activities carried out.

All operations and transactions must be correctly recorded in the company's accounting system, in a clear, transparent, and accurate manner, and in compliance with legal requirements and applicable accounting principles.

Recorded transactions must be authorized, verifiable, legitimate, consistent, and appropriate. Accounting transparency is based on the truthfulness, accuracy, and completeness of the information used for the accounting records. Each employee, within their respective functions and duties, is required to cooperate to ensure that management activities are correctly and promptly represented in the accounting records. For each operation or transaction, adequate supporting documentation must be retained to allow for:

- Easy accounting registration;
- Identification of different levels of responsibility;
- Accurate reconstruction of the operation, also to reduce the likelihood of interpretative errors.



Each record must accurately reflect what is shown in the supporting documentation. It is the responsibility of each employee to ensure that documentation is easily traceable and organized according to logical criteria. Those who become aware of omissions, falsifications, or neglect in accounting or documentation on which the accounting records are based must report it to their direct superior in the company hierarchy.

Cartografica Veneta SpA is committed to upholding the principles of transparency, professionalism, and maximum cooperation in relations with control bodies and auditing companies.

DISSEMINATION OF THE ETHICAL CODE AND TRAINING OF ASSIGNED PERSONNEL

3



DISSEMINATION OF THE ETHICAL CODE AND TRAINING OF ASSIGNED PERSONNEL

3

The dissemination of the Ethical Code and company procedures to the recipients is ensured through appropriate communication tools.

Cartografica Veneta SpA ensures that the Ethical Code is published on the internet at www.carven.it.

Cartografica Veneta SpA ensures that the Ethical Code is effectively implemented through continuous promotion of the most appropriate communication, training, and advisory support initiatives directed at the recipients.

The Ethical Code is subject to review and possible updates on an annual basis. Any updates, modifications, and/or additions to the Ethical Code will be approved by the Board of Directors of Cartografica Veneta and promptly disseminated to all recipients through the most suitable means.

PROVISIONS

4



4 PROVISIONS

Recipients, while fully respecting the law and applicable regulations, have the duty to be aware of the provisions of the Ethical Code and to align their actions and behaviours with the principles, objectives, and rules of conduct established by the Ethical Code. All actions, operations, and negotiations must be guided by maximum managerial integrity, completeness and transparency of information, legality both in formal and substantive aspects, clarity and truthfulness in accounting records, and respect for the principle of legality. Recipients are prohibited from engaging in any behaviour that is contrary to the provisions of the Ethical Code. Recipients are required to prioritize the company's interests. In conducting any activity, situations where the individuals involved are, or could even appear to be, in a conflict of interest must be avoided. A conflict of interest includes situations where the individual pursues an interest different from that of the Company or performs activities that may interfere with their ability to make decisions in the Company's interest, or personally benefits from business opportunities or acts contrary to the fiduciary duties related to their position.

CODE MONITORING

5



5

CODE MONITORING

The responsibility for overseeing compliance with this Code lies with all function managers. RSR10 will report annually on the findings of this oversight to the Board of Directors.



VIOLATIONS and SANCTIONS

6



VIOLATIONS and SANCTIONS

Non-compliance with the Ethical Code by the Recipients will result in different sanctions depending on the role of the involved Recipient, without prejudice to any rights for compensation for damages that may arise from such non-compliance.

Adherence to the Ethical Code by the Recipients adds to the general duties of loyalty, fairness, good faith execution of the contract and impacts the provisions of Article 2104 of the Civil Code (Diligence of the Employee). Violations of the Ethical Code constitute a breach of the obligations arising from the employment relationship, with all contractual and legal consequences, including the relevance of such violations as disciplinary offenses and/or the preservation of the employment relationship. For violations of the Ethical Code committed by individuals with a collaborative relationship with Cartografica Veneta, the sanctions outlined in their respective contracts will apply.

Cartografica Veneta is committed to providing and administering, in compliance with the company's disciplinary system and the provisions of the applicable national collective labour agreement (CCNL), sanctions proportional to the severity of the violations committed. Violations of the provisions and principles established in the Ethical Code may lead to the imposition of sanctions and/or other measures, including precautionary ones, expressly indicated in the Legislative Decree 231 of June 8, 2001.

Violations of the Ethical Code by members of the corporate bodies may result in the adoption of measures deemed most appropriate among those provided by law, by the competent corporate bodies.

REPORTING

7

7 REPORTING

Any violation or suspicion of a violation of the Ethical Code must be reported to the Compliance Committee. At the end of the investigation phase, the Compliance Committee, if it deems the report valid, will proceed with the necessary communications for the application of any sanctions.

Reports can be submitted, even anonymously, through confidential information channels:

- By mail, in a sealed envelope,
- Via email to wb@carven.it,
- Through the company website www.carven.it,
- Through the internal procedures provided by the whistleblowing system.

The Compliance Committee acts to ensure that the authors of reports are protected from any form of retaliation, discrimination, or penalization, or any consequences arising from such reports. The absolute confidentiality of the whistleblower's identity is also guaranteed, except in cases of good faith and legal obligations.



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Your world in a box