

Inglesina

# CODE OF ETHICS







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## *Message from the President*

A newborn child. Life begins. The first trip to home, the first strolls, the first incredible milestones. Witnessing these moments represents the essence of our **work** and gives profound meaning to the **responsibility** entrusted to us.

“ *That is why, since 1963, the year Inglesina was founded, we commit to providing products and solutions that ensure the best of the children’s well-being, during their journey to discover the world.* ”

This is our raison d'être and our most authentic promise. **A promise that we engage to keep every day**, inspired by our fundamental values: **respect for the environment, social responsibility, product excellence, and an ethical vision of business** capable of guiding our behaviors and relationships with all stakeholders.

It is for this reason that I am proud to present our **Code of Ethics**, which defines the principles and rules of conduct that inspire us, both in internal relations with the people who work at Inglesina and in relations with consumers, customers, suppliers, the Public Administration, and, in general, with all stakeholders involved in the company. I invite each of you to read this Code carefully, to understand its meaning, and to embrace its spirit because **it outlines the principles and behaviors upon which our growth, our reputation, and our future rest**—as an organization and as individuals.

*Ivan Tomasi*

# 1. INTRODUCTION

This **Code of Ethics** defines the values, principles, commitments, and ethical and behavioral responsibilities that inspire L'Inglesina Baby S.p.A. (hereinafter referred to as "Inglesina" or the "Company") in conducting its business activities.

There is  
**A STORY**  
*inside*

The Code of Ethics details a series of conduct **criteria** to which the activities of the Company, its employees, and all those who cooperate in the exercise of Inglesina's activities must conform in relation to all possible stakeholders.





# 2. GENERAL PRINCIPLES

## 2.1 SCOPE AND RECIPIENTS OF THE CODE OF ETHICS

The **Code of Ethics**, approved by the Company's Board of Directors, is addressed to the directors, auditors, and employees of Inglesina and to all those who operate, permanently or temporarily, on behalf of the Company (hereinafter referred to as the "Recipients") **for the proper functioning, reliability, and integrity of the Company**, its strategies, and its business model.

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 inspired by the values and principles of this Code of Ethics in the exercise of their activities.

The members of the Board of Directors must consider the principles of the Code of Ethics when setting the Company's objectives, proposing and implementing strategies, investments, and projects.

**Senior executives of the Company** are required to observe the contents of the Code of Ethics when developing processes and proposing and implementing activities and actions necessary to achieve the Company's objectives.



Employees must be guided by the Code of Ethics in their work activities, adjusting their behaviors and actions in the already due respect of the law and current regulations. In particular, the norms of this document constitute an essential part of the contractual obligations of personnel pursuant to and for the effects of Articles 2104\* and 2105\* of the Italian **Civil Code**.

**Collaborators** not bound by any subordinate relationship with Inglesina, as well as production and commercial partners involved in business relations with the Company both in Italy and abroad, are required, within the scope of the various relationships, to adjust their behaviors to the provisions of the Code of Ethics.

The Code of Ethics is valid both in Italy and in all countries where Inglesina operates, **through traditional commercial channels** as well as through **social media platforms** and e-commerce, while taking into account the cultural, social, and economic diversity of the various countries in which the Company is present.



\*Article 2104 of the Civil Code, entitled "Diligence of the employee", states: "The employee must use the diligence required by the nature of the service due, by the interest of the company and by the superior interest of national production. Regarding the performance and discipline of work, the employee must also observe the provisions imparted by the entrepreneur and by the collaborators of the latter on whom he hierarchically depends".

\*\* Article 2105 of the Civil Code, on the other hand, provides for the obligation of loyalty on the part of the employee, establishing that: "The employee must not conduct business, on his own behalf or on behalf of third parties, in competition with the entrepreneur, nor disclose information pertaining to the organization and production methods of the company, or use it in a way that could cause harm to it".

## 2.2 VALUES AND PRINCIPLES

The lines of conduct and behavioral rules outlined in the Code of Ethics are inspired by values and principles that have always represented **the essential and indispensable identity** heritage of the Company, on which its **reputation** and **trust relationship** with all interlocutors are based, whether they are employees, collaborators, customers, suppliers, organizations, associations, or institutions.



**Legality and Honesty**



**Respect for the Individual**



**Protection of Safety and Health**



**Environmental Responsibility**



**Well-being, Functionality, and Safety**



**Privacy and Confidential Information Protection**



**Respect for Competition and Fair Communication**



**Protection of Copyright and Intellectual and Industrial Property**



**Relations with the Territory**



**Relations with the Supply Chain, Institutions, Accredited Bodies, and Public Administration**



**Transparency and Truthfulness of Information, Financial Statements, and Corporate Communications**



## Legality and Honesty

Inglesina operates in strict compliance with current laws and regulations and principles of honesty and transparency in all the countries where it operates. This commitment is reflected in our internal regulations and procedures, the principles that inspire our business decisions, and our corporate behaviors.

The pursuit of the Company's interest can never justify conduct contrary to the principles of legality and honesty.

Inglesina opposes the violation of human rights, committing to strictly respect Italian and international laws aimed at applying embargoes or sanctions to countries that do not respect such values.

Inglesina places significant importance on the **principles of democratic order** and **free political determination** on which the State is founded, opposing any behavior that may constitute or be connected to terrorist activities or subversion of the democratic order, or that may constitute or be connected to transnational crimes related to criminal association, including mafia-type organizations, or personal aiding and abetting.



## Respect for the individual

In work relationships and corporate decisions, we are committed to promoting an **inclusive work environment** where every individual feels respected and valued for their

uniqueness. We commit to create a corporate culture in which all people, regardless of age, gender identity, ethnicity, nationality, language, sexual orientation, religious beliefs, health status, political and trade union opinions, feel accepted, respected, and have equal **opportunities**.

Inglesina respects the personal dignity, privacy, and personal rights of every individual and offers all workers equal opportunities for professional growth based on criteria of fairness and meritocracy.

Inglesina promotes the enhancement of the female role in the various corporate organizational contexts. We condemn any form of discrimination, harassment, sexual, personal, or other offenses, and any inappropriate behavior.





## Protection of Safety and Health

Inglesina is committed to protecting the **physical and moral integrity** of its collaborators, ensuring working conditions that respect human dignity and safe and healthy work environments. Inglesina is committed to achieving and maintaining the highest health and safety standards and ensures the adoption of necessary preventive measures against workplace injuries and illnesses, in full compliance with the provisions of **Legislative Decree 81/2008 (Consolidated Safety Act)** and other regulations in force.



## Environment Responsibility

We recognize the responsibility we have towards our planet and are determined to do our part to preserve it for **future generations**.

**In our commitment to environmental respect, we adopt a holistic approach that considers every phase of our products' life cycle, from design to production, from transport to disposal.**

Our commitment to environmental respect goes beyond regulatory compliance; it is an integral part of our corporate identity and guides our daily actions.



## Well-being, Functionality, and Safety

We commit every day to creating **innovative products** that ensure the best well-being for children and maximum functionality for parents. To do this, we adopt cutting-edge technical solutions and use materials of the highest quality. Furthermore, we pay maximum attention to safety, implementing rigorous controls and procedures that go beyond regulatory standards. This allows us to guarantee our customers safe, reliable, and durable products.



## Privacy and Confidential Information Protection

Inglesina, in accordance with current legal provisions, ensures the confidentiality of the information in its possession, committing to protect confidential, sensitive, or personal data of our collaborators or third parties (consumers, suppliers, sellers, and other subjects with whom we interact). The Company, in full compliance with the provisions of **European Regulation 679/2016 (GDPR)**, as well as the prescriptions of **Legislative Decree 196/2003** and subsequent amendments, ensures the correct processing of personal and special data in its possession.



## Respect for Competition and Fair Communication

Inglesina safeguards the value of fair competition in the market. Inglesina refrains from collusive, predatory, or abusive behaviors in the market and bases its communication on criteria of **clarity, transparency, and fairness**, avoiding communications that may lead consumers to confusion or erroneous interpretation of the characteristics and functionalities of company products.



Inglesina prevents as much as possible situations of erroneous use of its products by evaluating, from the research, design, and development phase, the risks associated with them.



### Protection of Copyright and Intellectual and Industrial Property

In conducting its activities, Inglesina ensures respect for the intellectual and industrial property rights of third parties and those concerning trademarks, industrial designs, and distinctive signs, condemning and opposing any possible form of counterfeiting.

Similarly, Inglesina protects its trademarks, patents, and, more generally, its industrial and intellectual property rights.

In the Company's publications and communication actions, the use and reproduction of materials or content (e.g., photographs, images, musical pieces, or audiovisual compositions, etc.) protected by **others' copyright** is prohibited, except as authorized by license/use agreements previously obtained with the holders of such rights.



### Relations with the Territory

The territory in which Inglesina operates has always been an element of enhancement of the company's history and culture. The Company is committed to taking into account, in its development programs, the needs of the community in whose territory it is located, with the aim of contributing to its **economic, social, and civil development**, as well as

its enhancement. Inglesina cultivates positive and proactive relationships with its reference **territorial fabric** and collaboration with all the actors operating there.



### Relations with the Supply Chain, Institutions, Accredited Bodies, and Public Administration

Inglesina conducts its activities with commitment and professional rigor. This professionalism is also reflected in the corporate organization and relationships with the production and distribution chain. Relationships between employees, at all levels, must be based on behavioral criteria of fairness, collaboration, loyalty, and mutual respect. Relationships with Italian and foreign suppliers, commercial partners, agents, and distributors are characterized by transparency and fairness and are aimed at ensuring the highest quality standards of Inglesina products and the satisfaction of the end consumer. Inglesina manages relationships with public administration and institutions in compliance with the principles of **legality, honesty, transparency, and clarity**, respecting current legislation in all the countries where it operates.

The same principles inspire relations with Bodies appointed to carry out inspection, approval, certification activities, and quality checks on company products.



### Transparency and Truthfulness of Information, Financial Statements, and Corporate Communications

In conducting various corporate activities, Inglesina provides complete, transparent, and accurate information. The Company ensures, in compliance with current regulations, that the principles of **transparency, truthfulness, and completeness** regarding any document highlighting economic, asset, or financial elements relating to the Company are respected.

### 2.3 RELATIONSHIP WITH THE ORGANIZATIONAL, MANAGEMENT, AND CONTROL MODEL PURSUANT TO LEGISLATIVE DECREE NO. 231/2001

In addition to this Code of Ethics, the Company has adopted the **Organizational, Management, and Control Model** pursuant to **Legislative Decree 231/01** (hereinafter also the "Model").

The Code of Ethics has a general scope and represents a tool adopted autonomously by the Company, even if it recalls conduct principles relevant for the Model.

This Code of Ethics complies, for the purposes of Legislative Decree June 8, 2001, No. 231 (Legislative Decree 231/2001), with the requirements provided by the "**Guidelines**

**for the construction of organizational, management, and control models pursuant to Legislative Decree 231/2001"** drawn up by Business Trade Association (Confindustria). In this regard, while the Code of Ethics directs the generality of the behaviors of its Recipients, the Organizational, Management, and Control Model, intended as a tool with specific purpose and relevance pursuant to **Legislative Decree 231/01**, responds to the specific prescriptions contained in the Decree, aimed at preventing the commission of particular types of crimes for facts that, apparently committed in the interest/ advantage of the Company, may give rise to administrative liability of the Company based on the provisions of the Decree itself.





# 3. CONDUCT CRITERIA

Below are the conduct criteria that all Recipients are required to respect.



## 3.1 GENERAL CONDUCT CRITERIA

### 3.1.1 Information Management

Information, data, and knowledge acquired, processed, and managed by Recipients in the exercise of their work activity must remain strictly **confidential** and appropriately **protected** and cannot be used, communicated, or disclosed, both inside and outside the Company, except in compliance with current legislation and company procedures.

By way of example and not limited to, confidential information may include:

- company plans, strategic, economic/financial, commercial, managerial, operational;
- projects and investments;
- personnel data;
- company indicators, performance, and productivity;
- corporate and commercial agreements;
- information protected by intellectual or industrial property rights, know-how related to the production, development, and marketing of products or services;
- company databases.

Recipients, in handling such data and information, must exercise the utmost care and confidentiality, avoiding disclosing confidential information of the Company.

Recipients are required not to use confidential information for purposes other than those related to performing their activities and must:



- acquire and process data and information in compliance with specific company procedures;
- store the data in such a way as to prevent unauthorized persons from becoming aware of them;
- communicate the data only after obtaining explicit authorization from the responsible parties, ensuring that they are disclosable;
- ensure that there are no absolute or relative constraints on the disclosure of information concerning third parties and, if necessary, obtain their consent.

All information available to the Company is treated in full respect of the confidentiality and privacy of the interested parties, with particular observance of the provisions of **Legislative Decree 196/2003** and subsequent amendments and the **European Regulation 679/2016**, which all Recipients are required to respect.

### 3.1.2 Donations, Gifts, Presents, Benefits

Recipients are expressly **prohibited** from distributing gifts and presents outside of what is provided by company practice, which allows only low-value gifts.

In particular, it is forbidden to offer **gifts** or **presents** exceeding normal commercial or courtesy practices or in any case aimed at obtaining favorable treatment in conducting any company activity.

Specifically, any form of **gift** to Italian and foreign public officials (even in those countries where gift-giving is a widespread practice), or to employees or collaborators of Bodies involved in inspection, approval, homologation, certification, or verification of the technical and qualitative characteristics of products, or to their family members, that may influence independent judgment or induce any advantage for the company, is prohibited.

Even company products released as samples or gifts are always characterized by respect for the principle of low value, both individually and collectively in the case of gifts/samples consisting of multiple company products.

Administrators, senior executives, and employees are allowed to accept gifts or other forms of presents from third parties who have or may potentially have relationships with the Company, within the limits of normal courtesy relations and only if of modest value. It is forbidden to accept gifts in the form of **money or goods easily convertible into money**. If an inappropriate gift is received that does not meet the above criteria, it must be refused.

**Inglesina may decide to make donations or charitable contributions to associations, non-profit entities, territorial entities, or other types, aimed at supporting projects characterized by high cultural, social, or ethical content or territorial promotion.**

In this case, donations must be made directly by the Company, with top-level decisions implemented in compliance with the established deliberative processes and only to Entities endowed with the necessary credibility and reputational reliability. Therefore, any cash donation to individuals is prohibited.

### 3.1.3 Communication and Relations with the Media

Any communication outside the organization of documents and information of any nature and in any form concerning Inglesina must take place in compliance with the laws and professional conduct practices in force, must be carried out with **transparency and clarity**, and must be expressly authorized by the responsible company officials.



The dissemination of **false, tendentious, or confidential news** concerning the Company, its employees, or collaborators is prohibited. Recipients are required to respect these conduct criteria and avoid behaviors aimed at acquiring favorable attitudes from the media and press.

## 3.2 CONDUCT CRITERIA IN RELATIONS WITH COLLABORATORS

### 3.2.1 Personnel Selection

Without prejudice to obligations arising from current provisions, the selection and evaluation of personnel are carried out respecting **equal opportunities** for all interested parties. The company department that oversees personnel management, within the limits of available information, adopts appropriate measures to promote equal opportunities and avoid favoritism, nepotism, or forms of clientelism in selection and hiring phases.

### 3.2.2 Establishment of the Employment Relationship

Personnel are hired with a **regular employment contract**, and no form of work that does not comply with current laws and **applicable National Collective Labor Agreements** is tolerated. Upon establishing the employment relationship, each collaborator receives



information on the characteristics of the function and duties to be performed, normative and remuneration elements, and rules and procedures to be respected.

### 3.2.3 Human Resources Management

Inglesina is aware that the **dedication and professionalism** of employees are determining values and conditions for achieving its objectives. The Company is committed to developing the skills, competencies, and potential of each employee, respecting the prohibition of gender discrimination and promoting equal opportunities and female employment.

Inglesina offers all workers equal opportunities for professional growth, ensuring that everyone can enjoy fair treatment based on merit criteria, without any discrimination.

**Company managers** must:

- adopt criteria of merit, competence, and strictly professional considerations for any decision regarding an employee;
- manage employees without any discrimination;
- create a work environment where personal characteristics cannot give rise to discrimination.

The Company expects employees at all levels to collaborate in maintaining an environment of mutual respect for the **dignity, honor, and reputation** of each person. Inglesina rejects injurious or defamatory interpersonal attitudes and intervenes to prevent them.

### 3.2.4 Integrity and Protection of the Person, Health, and Safety

Inglesina invests its role in protecting working conditions and the physical and **psychological integrity** of workers, avoiding that they suffer unlawful conditioning or undue discomfort.

The Company is committed to protecting the moral integrity of employees and collaborators, guaranteeing the right to working conditions respectful of personal dignity. The collaboration of all employees is required to maintain a climate of mutual respect for the dignity, honor, and reputation of each person.

**Discrimination, harassment, and sexual, personal,** or other offenses are not allowed. The Company ensures compliance with the general ban on smoking in workplaces in accordance with current regulations.

In conducting its activities, Inglesina guarantees full compliance with regulations on workplace **safety and health**, with particular but not exclusive reference to **Legislative Decree 81/2008** and subsequent amendments, through analysis, monitoring, prevention, and management of risks associated with professional activity. Recipients are required to implement and comply with all prescribed prevention and safety measures.

### 3.2.5 Privacy Protection

The Company guarantees full compliance with regulatory prescriptions on **data confidentiality** and **privacy protection**, adopting the standards provided by law (**Legislative Decree 196/2003** and subsequent amendments and **EU Reg. 679/2016** –

**GDPR**) for data processing. With particular reference to the processing of employees' personal data, the Company implements specific precautions to inform them about the nature of personal data being processed, processing methods, and communication areas.

Recipients are required to implement all prescribed measures and precautions and not to use data for purposes unrelated to the performance of the activity entrusted to them.



### 3.2.6 Protection and Use of Company Assets

Company assets consist of physical **material goods** (e.g., computers, printers, equipment, cars, real estate, infrastructures) and **intangible assets** (e.g., trademarks, patents, etc.). The preservation of assets is a fundamental value for safeguarding corporate interests.

Recipients, in carrying out their corporate 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 conduct of corporate activities or purposes authorized by the responsible parties.



### 3.2.7 Use of Information Systems

The Company adopts policies for managing information systems to ensure the security of **applications, data, and equipment**. Recipients are required to:

- respect and apply such policies, with particular but not exclusive reference to the management and protection of system access **passwords**;
- not illegally duplicate **software and applications** installed on systems;
- not install software or applications on systems without prior **authorization** from the responsible Functions;
- not access information systems without prior authorization from the responsible company Functions;
- not engage in behaviors that may jeopardize the **security, integrity, or usability of data**.

## 3.3. CONDUCT CRITERIA IN RELATIONS WITH CUSTOMERS, CONSUMERS, AND SUPPLIERS

### 3.3.1 Relations with Customers and Consumers

Negotiations and communications with customers, both on traditional channels and digital channels (e-commerce), are based on availability and respect for principles of **fairness, professionalism, and transparency**.

The behavior of employees and all collaborators of the Company towards customers must adhere to these principles and be aimed at providing high-quality services that meet their reasonable expectations and needs. Inglesina commits not to arbitrarily discriminate against its customers.

Contracts and communications with such parties must be clear, simple, complete, and compliant with current regulations.

The use of **misleading and untruthful advertising tools** is prohibited. Inglesina is open and available for continuous dialogue with its consumers and adopts appropriate organizational measures to ensure that they can interact with the Company, even through their retailers, to request information, report specific needs, or express assistance requirements on products or spare parts.

### 3.3.2 Relations with Suppliers

The quality of the Company's suppliers reflects on the **quality** of Inglesina products.

For this reason, in **supplier selection and qualification** processes, great attention is paid to the criteria by which the supplier can ensure the quality of their supplies, compliance with current national and international regulations, and regulatory controls.

Supplies are analyzed and controlled according to rigorous **quality control processes**.

Purchases are based on the general criterion of collaboration with suppliers and equal opportunities for them. Supplier qualification and selection are aimed at seeking the highest quality of performance.

In procurement relationships and, in general, supply of goods and/or services.

Recipients are obliged to:



- observe **internal procedures** for the selection and management of supplier relationships;
- not preclude a priori any **interested company**, that demonstrates it meets the required criteria, from competing to win a supply, adopting objective and documentable evaluation criteria in selection, according to declared and transparent methods;
- observe the **contractually stipulated conditions**, maintaining a frank and open dialogue with suppliers, in line with good commercial practices;
- verify that suppliers have adequate means, including financial, structures, and **capabilities** to meet the Company's needs.

Compliance with labor law, health, and safety regulations by the supplier is considered an essential and indispensable element in the **supply relationship**, both in Italy and in foreign countries where the Company operates.

Inglesina expects all its suppliers and partners to guarantee compliance with current Italian and foreign regulations regarding the prohibition of illegal labor, exploitation of labor, and unlawful use of child labor.

Inglesina condemns any behavior by its suppliers contrary to the principles and obligations referred to in these regulations.

### 3.4 CONDUCT CRITERIA IN RELATIONS WITH THE COMMUNITY AND PUBLIC ADMINISTRATION

#### 3.4.1 Environmental Protection as a Collective Good

Inglesina's activities are managed in full compliance with current environmental **protection regulations**.

Management activities must refer to advanced **environmental protection criteria**, and corporate strategies must consider the development of processes characterized by increasing attention to **environmental safety**.

Recipients, within their duties, participate in the process of risk prevention and environmental protection.





### 3.4.2 Relations with Political and Trade Union Organizations

Inglesina does not provide contributions, direct or indirect, in any form, to parties, movements, committees, and political and trade union organizations, their representatives, and candidates with whom a **conflict of interest** may be identified. The Company also refrains from exerting any direct or indirect pressure on political representatives.

### 3.4.3 Sponsorships

Inglesina may adhere to **sponsorship requests** limited to proposals from Entities or Associations that present high socio-cultural value or **territorial promotion** and are in line with company values and strategies.

Sponsorship activities may only be intended for initiatives proposed by subjects with **adequate credibility**, featuring quality and originality characteristics.

In any case, the Company, in evaluating proposals to adhere to, pays attention to any possible conflict of interest.

**Requests for contributions** or **sponsorships** must be authorized by top management in compliance with current company procedures.

### 3.4.4 Relations with Public Administration, including its visits and inspections

Relations with **Public Administration**, necessary for managing corporate activities, are reserved exclusively for subjects delegated by the Company with **explicit mandate** and must not create conflicts of interest.

Relations must be based on maximum transparency, clarity, correctness, and such as not to induce partial, biased, ambiguous, or misleading interpretations by private and public institutional subjects with whom relationships are maintained for various reasons.



The Company commits to ensuring compliance with current regulations in any interlocution with the Public Administration and not to offer, directly or through intermediaries, sums of money or other undue benefits to public officials or persons in charge of a public service to influence their activities in performing their duties.

Inglesina commits to scrupulously observing the rules set by the Authorities for compliance with current regulations in sectors connected with its activity.

Recipients must respect these conduct criteria, comply, where applicable, with requests from **regulatory or supervisory bodies**, and provide their support with transparency and availability during inspection activities.



# 4. ACCOUNTING TRANSPARENCY AND INFORMATION

Operations and transactions must be correctly recorded in the **company's accounting system**, respecting the criteria indicated by law and applicable accounting principles. Recorded operations must be authorized, verifiable, legitimate, consistent, and appropriate.

The Company respects current regulations, principles, rules, and accounting, administrative, and tax obligations in force in Italy and other countries where it may operate.

**Accounting transparency** is based on the truthfulness, accuracy, and completeness of the underlying information for related accounting entries. Each employee is required to collaborate so that management facts are represented correctly and promptly in accounting.

For each operation or transaction, adequate supporting documentation of the activity performed must be kept on file to allow:

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

The responsible company Functions ensure that the documentation is easily traceable and organized according to logical criteria.

Recipients commit to respecting principles of **transparency, professionalism, and maximum collaboration** in relations with auditors and companies that perform accounting audits.



# 5. PROVISIONS

The Company ensures the dissemination of the Code of Ethics and adequate tools for knowledge and clarification regarding its contents to Recipients.

Recipients, in the already due respect of the law and current regulations, have the duty to know the provisions of the Code of Ethics and to adjust their actions and behaviors to the **principles, objectives, and conduct rules** provided by the Code of Ethics. In particular, all actions, operations, and negotiations carried out are inspired by maximum managerial correctness, completeness, and transparency of information, formal and substantive legality, clarity and truthfulness in accounting records, and respect for the principle of legality.

Recipients are prohibited from engaging in behaviors in any way contrary to the provisions of the Code of Ethics.

Recipients are required to consider the **company's interest** as a priority. In conducting any activity, situations where the involved subjects are, or may even appear to be, in conflict of interest must be avoided, meaning situations in which the subject pursues an interest different from that of the Company or engages in activities that may interfere with their ability to make decisions in the Company's interest, or personally benefits from business opportunities or acts in contrast with fiduciary duties related to their position.



# 6. CONTROL AND VIOLATIONS OF THE CODE



## 6.1 CONTROL OVER THE CODE OF ETHICS

Control over the Code of Ethics is entrusted to the **Supervisory Body**.

As defined in the Organizational, Management, and Control Model pursuant to Legislative Decree 231/01 adopted by the Company, to this Supervisory Body together with the specific functions indicated in the Model, is assigned the task of verifying compliance with the Code of Ethics, receiving and analyzing any reports of Code violations, and reporting to the Board of Directors the opportunity to proceed with updates to it.

## 6.2 VIOLATIONS

In case of violations, and, where deemed necessary for the protection of corporate interests, the Company adopts **disciplinary measures** against the responsible for the violations, in compliance with the regulatory framework in force.

Compliance with the Code of Ethics must be considered an essential part of the contractual obligations of the Company's employees, pursuant to and for the effects of the provisions of Article 2104 and following of the Italian Civil Code.

Violations of the Code of Ethics therefore constitute contractual **non-fulfillment** and/or **disciplinary offense** with all the consequences provided in accordance with current legislation and the applicable national collective labor agreement.



In case of violations by **Executives**, the most appropriate measures will be applied in accordance with the provisions of current contractual regulations.

In case of violations by members of the **Company's Board of Directors**, the Supervisory Body will inform the entire Board of Directors and the Board of Statutory Auditors, who must take appropriate initiatives under the law, involving, where necessary, the Shareholders' Meeting.

In case of violations by one or more **Statutory Auditors**, the Supervisory Body will inform the entire Board of Statutory Auditors and the Board of Directors, who will take appropriate measures, such as, for example, convening the Shareholders' Meeting to adopt the most appropriate measures provided by law.

Behaviors contrary to the Code of Ethics by **collaborators, suppliers, or commercial partners** may result in the application of liquidated damages or, in the case of serious

non-fulfillment, termination of the contractual relationship, without prejudice to any claim for damages if they cause harm to the Company, even regardless of the termination of the contractual relationship.

### 6.3 REPORTING

Any violation or suspected violation of the Code of Ethics can be reported through the **whistleblowing management** system established by the Company, governed by the "whistleblowing procedure" and available on Inglesina websites [[www.inglesina.it](http://www.inglesina.it)] (<https://www.inglesina.it>) or [[www.inglesina.com](http://www.inglesina.com)] (<https://www.inglesina.com>) in the "whistleblowing" section.

If the report falls within the subjective or objective parameters provided by Legislative Decree 24/2023, it will be managed by applying all the measures provided by the aforementioned decree. For further information, please consult the "whistleblowing procedure" available in the aforementioned section of the company's websites.





# 7. ENTRY INTO FORCE AND AMENDMENT METHODS

This Code of Ethics comes into force from 19th June 2024, date of its **adoption** by the Board of Directors of L'Inglesina Baby S.p.A.

Any **changes or additions** must be approved by the Board of Directors.



**Inglesina**