



TAVI S.p.A.
Materie Prime per Industrie Alimentari

Ethical Code

ETHICAL CODE

TAVI S.p.A. — Via al Santuario di Ns. Signora della Guardia 43P — 16162
Genova-Bolzaneto

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1. FOREWORD AND LETTER FROM THE MANAGEMENT

TAVI S.p.A. carries not only economic interests, but a broader, more extended and articulated responsibility towards all parties that — in various capacities — come into contact with our activity: employees, customers, suppliers, the local communities in which we operate, institutions and the natural environment that hosts us. This awareness is not recent: it is rooted in over a century of Genoese entrepreneurial history, which began in 1897, and has settled into a corporate culture that places fairness and respect for people as an indispensable condition of doing business.

In carrying out its business — importation, storage, processing, packaging and distribution of raw materials for the food industry — TAVI S.p.A. recognizes that its behavior has effects that extend far beyond company boundaries, touching health, work, the future and collective well-being. It is fundamental, therefore, to demonstrate a concrete and verifiable commitment to respecting those values that the community recognizes as fundamental.

This Code of Ethics is the tool with which TAVI S.p.A. communicates to its stakeholders — internal and external — the values that guide our work, the responsibilities we assume and the behaviors we commit to maintain. This document is the genuine expression of the identity of the Organization and the point of reference to which everyone — Management, employees, collaborators, suppliers — must align their conduct.

*The Management
TAVI S.p.A.*

2. INTRODUCTION - IDENTITY, MISSION AND VALUES OF TAVI S.P.A.

TAVI S.p.A. is committed to disseminating this Code of Ethics to all stakeholders and to adapting its reference principles in line with regulatory updates and the values accepted by the context in which it operates. Compliance with the Code of Ethics is an essential objective: the Organization implements, compatibly with its capabilities, all actions and makes available all tools so that the behaviors carried out in its interest are compatible with these values.

Founding values

The activity of TAVI S.p.A. is driven by six fundamental values that define its identity:

- Integrity: acting consistently with declared principles, even in the absence of external control. Integrity is the foundation of trust and the prerequisite for any lasting relationship.
- Respect: recognizing and protecting the dignity of every person — employee, customer, supplier, community member — regardless of their origin, condition or role.
- Transparency: communicating clearly and completely, avoiding ambiguity and relevant



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omissions in both internal and external relations.

- Responsibility: assuming the consequences of one's choices and actions in a manner proportionate to the role held, valuing individual contribution to the collective result.
- Legality: respecting the laws and regulations in force in every operational context, considering regulatory compliance a prerequisite and not a limit.
- Sustainability: operating with respect for the environment and future generations, integrating the social dimension into the corporate strategy as a structural factor of competitiveness.

3. SCOPE OF APPLICATION AND RECIPIENTS

This Code defines the set of rights, duties and responsibilities that TAVI S.p.A. assumes towards all stakeholders with whom it interacts in the context of its activity. The behaviors prescribed by the Code complement the conduct relevant for the correct fulfillment of the diligence obligations expected from executives and personnel in general.

The Code of Ethics applies to and binds:

- all employees, regardless of hierarchical level, contract type (permanent, temporary, part-time) and place of work;
- corporate bodies of the Organization;
- occasional collaborators, consultants, temporary agency workers and any other subject acting in the interest of TAVI S.p.A.;
- suppliers, subcontractors and commercial partners, within the limits and for the effects of contractual relationships with TAVI S.p.A.

The violation of the rules of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences also regarding the retention of the employment relationship, and may result in liability for damages arising therefrom. TAVI S.p.A. is committed to conducting investigations into any report of violation of the Code rules, evaluating the facts and, in case of an established violation, implementing appropriate disciplinary measures for employees, corporate bodies and various interlocutors, where applicable.

The Code must be brought to the knowledge of all employees at the time of hiring and on the occasion of every revision. Contracts with suppliers and external collaborators contain clauses that recall compliance with the principles of the Code; failure to comply by third parties may constitute grounds for termination of the contractual relationship.

4. GENERAL PRINCIPLES OF BUSINESS CONDUCT

TAVI S.p.A. considers compliance with applicable laws and regulations an indispensable principle. Every employee must commit to respecting the regulatory provisions applicable to the activity performed. This commitment also applies to consultants, suppliers, customers and anyone who has relations with the Company: TAVI S.p.A. will not initiate or continue any relationship with anyone who does not intend to align with this principle.

TAVI S.p.A. develops its business by requiring its employees and other recipient subjects to adapt their behaviors to the values of business conduct set forth here. In particular, the



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- avoids, in relations with all interlocutors, any discrimination based on age, sex, health status, nationality, political opinions, religious beliefs or any other personal characteristic protected by law;
- commits to pursuing the ethical principles of fairness, transparency and loyalty in all commercial relations;
- rejects any situation that creates arbitrary discrimination against personnel or substantial conflicts of interest between each subject and the Organization;
- does not allow forms of gifts or hospitality that can be interpreted as exceeding normal practices of courtesy or aimed at acquiring preferential treatments in the conduct of any activity;
- commits to ensuring that subjects involved in its activities are not — nor can appear to be — in a conflict of interest.

4.1 Employees, collaborators and consultants

The Code of Ethics is an integral and substantial part of the employment contract of every employee of TAVI S.p.A.; the Organization demands strict compliance with the provisions of the Code from all employees. Any violation entails the adoption of appropriate disciplinary measures.

Employees, therefore:

- are required to know the rules contained in the Code and the reference provisions governing their specific activity;
- have the obligation to point away from behaviors contrary to the principles of the Code and the referenced rules;
- must cooperate with the Management in verifying possible violations;
- are required to contribute to maintaining a work environment respectful of the sensitivity of others;
- may use company premises, equipment, IT systems and any other corporate resource exclusively for carrying out their competent business activities.

Anyone who holds a role of responsibility — chief, function manager or site manager — must represent an example and a guide for their collaborators, demonstrating through their own behavior that respect for the Code is a fundamental aspect of running the business. All managers have the obligation to report every case of non-compliance with the rules of the Code and to ensure the protection of those who have made reports in good faith.

4.2 Relations with authorities and public institutions

TAVI S.p.A., through its people, ensures loyalty and cooperation with the Authorities. Employees and external collaborators whose actions may be attributable to the Organization must maintain, in relations with the Public Administration, behaviors characterized by fairness, transparency and traceability. Relations with the Public Administration are



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reserved for the competent functions, in compliance with approved programs and company procedures.

It is absolutely forbidden to render, induce or favor false statements to the Authorities. Within any public tenders, TAVI S.p.A. bases its conduct on the principles of fair competition and honesty, rejecting any practice that may alter the regular course of procedures.

5.RELATIONS WITH HUMAN RESOURCES

The people who work in TAVI S.p.A. are the most important resource of the Organization. Human resources management is based on respect for dignity, substantial fairness and the enhancement of individual contribution to collective growth. TAVI S.p.A. recognizes that a fair, safe and inclusive work environment is not only a regulatory obligation, but a condition of organizational effectiveness and responsible development of the enterprise.

5.1 Employment conditions and remuneration

All employment relationships are regulated in full compliance with current legislation and the applicable National Collective Labor Agreement (CCNL). Remuneration is at least equal to contract minimums and is paid within the terms and in the manners provided by law. Information on working conditions and remuneration is made available to every worker in written and understandable form. Disciplinary measures are adopted in accordance with the provisions of the CCNL and the Workers' Statute.

5.2 Occupational health and safety

The activities of TAVI S.p.A. are managed in compliance with current legislation for the protection of working conditions, and the Organization guarantees a suitable work environment from the point of view of employee safety and health, adopting all necessary measures in compliance with Legislative Decree 81/2008. The recipients of the Code commit to respecting the preventive measures adopted and not to expose other employees to unnecessary risks that could cause damage to their health or safety. Workers receive regular and documented safety training and are equipped with suitable personal and collective protective equipment.

5.3 Working hours

Working hours comply with the law and the applicable CCNL. Overtime work is not excessive and is compensated according to contractual provisions. TAVI S.p.A. respects the daily and weekly rest periods provided by regulations and commits to managing workloads proportionately.

5.4 Non-discrimination, diversity and inclusion

TAVI S.p.A. initiates, regulates and manages employment relationships ensuring that merit and skills are the determining criteria in every choice concerning people. No discrimination is allowed in hiring, remuneration, access to training, promotions, dismissal or retirement based on: gender, age, nationality, ethnic origin, religion or belief, disability, sexual orientation, marital status, pregnancy and parenthood, political opinions, trade union membership. TAVI



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S.p.A. actively promotes an inclusive work environment, in line with the principles of the ISO 30415:2021 standard and its own Management System for Diversity and Inclusion (MDI).

5.5 Freedom of association and collective bargaining

All workers have the right to join or form trade union organizations of their choice. TAVI S.p.A. adopts an open attitude towards union activities and respects their representative prerogatives. Workers' representatives do not suffer discrimination and have access to workplaces to carry out their representative functions. If the right to freedom of association is restricted by law, the Organization facilitates, rather than hinders, the development of alternative means of representation.

5.6 Prohibition of forced labor and child labor

Any recourse to forced, compulsory or non-free labor, in any form, is categorically prohibited. Workers are not required to hand over identity documents nor to pay deposits as a condition for employment, and are free to resign from the employment relationship with the contractually required notice. TAVI S.p.A. does not resort to child labor and fully respects applicable national regulations, in line with ILO Conventions C138 (minimum age) and C182 (worst forms of child labor) illustrated in Chapter 8.

5.7 Protection of personal dignity and prevention of harassment

TAVI S.p.A. adopts a zero-tolerance policy towards any form of harassment in the workplace, in accordance with ILO Convention No. 190 on violence and harassment in the world of work, and current regulations on health and safety, including Legislative Decree 81/2008. This policy is implemented through the adoption of preventive, reactive and training measures aimed at protecting the dignity, health and psychophysical well-being of all workers.

Harassment is defined as unwanted behavior — of a physical, verbal or non-verbal nature — that violates the dignity of the person and creates an intimidating, hostile or degrading working environment. It can take many forms: inappropriate insinuations or comments, unwanted physical contact, undue pressure, threats, discrimination based on gender, age, sexual orientation, ethnicity, disability or personal beliefs. Non-consensual sexual advances, exposure to offensive material and any behavior that exploits a position of power to intimidate, demean or condition a person are also unacceptable.

The consequences of harassment can be significant both at an individual level — psychological damage such as anxiety, depression and chronic stress — and at an organizational level, compromising the working climate, productivity and corporate reputation. For this reason, TAVI S.p.A. commits to treating every incident with the utmost seriousness, adopting disciplinary measures proportionate to the severity of what happened, which may include a formal warning, suspension or, in the most serious cases, termination of the employment relationship. Counter-measures also extend to relationships with suppliers, customers and partners: every contract is subject to compliance with corporate ethical standards and violations by third parties can lead to the termination of the contractual relationship.



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6. ANTI-CORRUPTION AND INTEGRITY IN COMMERCIAL RELATIONS

TAVI S.p.A. adopts a zero-tolerance policy towards corruption in all its forms — active, passive, direct and indirect — as well as towards behaviors that, while not configuring a crime, may even only appear corrupt or capable of unduly influencing the decisions of third parties. This commitment extends to all contexts in which the Organization operates, regardless of local practices and the size of the consideration.

The corporate crime prevention principles set forth here are integrated into the corporate governance system, constituting a binding reference for all recipients of the Code.

6.1 Specific prohibitions

- Offering, promising, giving or accepting — directly or through intermediaries — money, gifts, utility or other advantages to anyone for the purpose of obtaining or maintaining a contract, an authorization or any preferential treatment;
- Making undocumented, off-account or cash payments for amounts exceeding legal limits, without adequate verifiable economic justification;
- Altering, falsifying or destroying accounting, commercial or administrative documents;
- Receiving undeclared utilities from third parties that could influence — or appear to influence — corporate decisions;
- Facilitating, tolerating or covering up corrupt behavior by employees, collaborators or partners.

6.2 Relations with the Public Administration

Relations with public entities, supervisory authorities and other subjects exercising public functions are grounded on maximum transparency and traceability. No employee or collaborator can, in the name or on behalf of TAVI S.p.A., offer or promise advantages to public officials or persons in charge of a public service to influence their decisions. Every communication with the Public Administration is documented and verifiable. TAVI S.p.A. commits, when participating in public tenders, to align its conduct with the principles of fair competition and correctness.

6.3 Bookkeeping and financial transparency

All corporate operations must be recorded truthfully, accurately and timely in the company accounts, so that every transaction is duly authorized, recorded and verifiable with the support of adequate documentation. The establishment of hidden funds, the falsification of accounting documents or any form of untruthful representation of financial statements is not permitted. The Management guarantees the integrity of the internal control system and the transparency of accounting and management information towards both inside and outside the Organization.

7. CONFLICT OF INTEREST

A conflict of interest occurs when an employee, a collaborator or a member of corporate bodies finds themselves, even only potentially, in a situation where their personal interest — or that of subjects connected to them for family, economic or friendship **reasons** — **diverges**



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from the interest of TAVI S.p.A. and could condition their professional decisions or behaviors.

The management of conflicts of interest is not limited to the prohibition of certain behaviors, but requires proactivity: anyone who perceives the risk of finding themselves in such a situation is required to communicate it before acting.

7.1 Relevant cases

Situations of conflict of interest include, by way of example but not limitation:

- holding significant stakes or operational roles in competing companies, customers or suppliers of TAVI S.p.A., without prior written communication to the Management;
- participating in corporate decisions — purchases, selections, negotiations — concerning subjects with whom one maintains significant personal, family or economic relationships;
- economic and financial interests of an employee or their family members in supply or purchase activities involving TAVI S.p.A.;
- using one's position in the Organization, or the information acquired in one's work, to create a personal advantage in conflict with the interests of the Organization;
- receiving compensation, assignments or advantages from suppliers, customers or third parties in relation to one's corporate functions, without authorization from the Management;
- performing secondary work activity that interferes with obligations towards TAVI S.p.A. or that uses company resources.

7.2 Obligation of communication and abstention

Any situation that constitutes or may generate a conflict of interest must be immediately communicated in writing to the Management or to the Integrated Management Manager (RGI). Every employee must communicate the existence of any financial, commercial, professional, family or friendship relationship such as to be able to influence the impartiality of their conduct towards third parties. Failure to communicate a conflict situation is in itself a violation of this Code. The Management will decide, case by case, the appropriate measures — including eventual abstention from the decision concerned — guaranteeing proportionality and respect for confidentiality.

8. GIFTS, HOSPITALITY AND REPRESENTATION EXPENSES

The exchange of gifts and hospitality in commercial relations is a widespread practice which, if not clearly regulated, can degenerate into forms of improper influence or corruption. TAVI S.p.A. adopts clear rules to ensure that such exchanges remain within the bounds of normal commercial courtesy and do not compromise the independence of judgment of the parties nor the reputation of the Organization.

The applicable rules are as follows:

- it is permitted to offer or receive gifts of modest value — ordinarily not exceeding 100.00 euros — provided they are goods or services of common use, offered on appropriate occasions (festivities, inaugurations, company events) and non-systematically;
- cash, securities, shopping vouchers or any other monetary utility can never be offered or received, regardless of the amount;



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- it is never permitted to offer or receive gifts — of any value — when they are intended to influence or condition a commercial, contractual or administrative decision;
- the offering or receiving of gifts to/from public officials or representatives of public entities requires prior written authorization from the Management, even for amounts below the indicated threshold;
- all gifts received that exceed the value of 100.00 euros must be promptly communicated to the Management, which will decide whether to return them, refuse them or donate them to charitable purposes.

Representation expenses

Representation expenses — business meals, events, hospitality to customers or suppliers — must be proportionate to the context, documented with a regular receipt and consistent with sector practices. They must never assume dimensions such that they can be interpreted as a form of undue influence. Every representation expense is authorized by the Management and recorded in the company accounts.

9. HUMAN RIGHTS — UNGP FRAMEWORK AND ILO CONVENTIONS

TAVI S.p.A. recognizes and respects fundamental human rights enshrined in the Universal Declaration of Human Rights of the United Nations (1948) and the Conventions of the International Labor Organization (ILO). The Organization's commitment to human rights is based on a systemic approach, consistent with its size and operational context in the food and logistics sector.

9.1 The United Nations Guiding Principles (UNGPs) framework

The United Nations Guiding Principles on Business and Human Rights — UNGPs, adopted in 2011 by the UN Human Rights Council define the responsibilities of private companies in respecting human rights, structured around three fundamental pillars:

- **Protect:** obligation of States to protect human rights from abuses by third parties, including businesses; companies must comply with the regulatory frameworks established by States for rights protection.
- **Respect:** autonomous responsibility of businesses to respect human rights — independent of legal obligations — avoiding causing or contributing to violations through their activities or commercial relations. This responsibility is exercised through human rights due diligence.
- **Remedy:** access of harmed parties to effective remedies, both judicial and non-judicial; companies must have proportionate grievance mechanisms for managing violations.

TAVI S.p.A. adopts the UNGPs principles as a management guidance tool, in a manner proportionate to its size. In practice, this translates into the policy commitment formalized in this Code, simplified due diligence on main suppliers, and the establishment of internal reporting mechanisms described in Chapter 14.

The International Labor Organization (ILO) has adopted over its history a corpus of fundamental Conventions defining the essential rights of workers globally. In 2022, the ILO updated the list of fundamental Conventions, bringing it from eight to ten, adding the



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Conventions on health and safety. TAVI S.p.A. commits to respecting and promoting the principles of all ten fundamental Conventions.

Forced labor

ILO Convention C29 — Forced Labor (1930) requires the elimination of all forms of forced or compulsory labor. TAVI S.p.A. guarantees that no employee works against their will, does not retain documents and ensures the right to resign with contractual notice.

ILO Convention C105 — Abolition of Forced Labor (1957) prohibits the use of forced labor as a tool of political coercion, punishment or discrimination. TAVI S.p.A. does not resort to any form of coercion in labor organization.

Trade union freedom

ILO Convention C87 — Freedom of Association (1948) guarantees the right of every worker to establish or join organizations of their own choosing. TAVI S.p.A. respects and does not hinder in any way the exercise of this fundamental right.

ILO Convention C98 — Right to Organize and Collective Bargaining (1949) protects workers from acts of anti-union discrimination and guarantees the right to collective bargaining. TAVI S.p.A. engages with union representatives in full respect of the prerogatives recognized to them by law and the CCNL.

Child labor

ILO Convention C138 — Minimum Age (1973) establishes the obligation of States to set a minimum age for access to employment and to progressively raise this threshold. TAVI S.p.A. does not hire workers below the age provided by Italian law and systematically verifies candidates' documentation.

ILO Convention C182 — Worst Forms of Child Labor (1999) requires the immediate elimination of the most severe forms of child labor (slavery, trafficking, dangerous work). TAVI S.p.A. extends this principle to its supply chain, requiring suppliers to comply with the same standards.

Non-discrimination

ILO Convention C100 — Equal Remuneration (1951) enshrines the principle of equal pay between men and women for work of equal value. TAVI S.p.A. applies the salary tables of the CCNL without gender distinction and monitors the distribution of salary levels within its D&I KPI system.

ILO Convention C111 — Discrimination in Employment (1958) prohibits any discrimination in employment and occupation based on race, color, sex, religion, political opinion, national extraction or social origin. TAVI S.p.A. prohibits any discrimination in hiring, promotions, training and working conditions.

Health and safety

ILO Convention C155 — Occupational Safety and Health (1981) requires national and company policies regarding occupational safety and health, with particular attention to accident prevention. TAVI S.p.A. fulfills this principle through the Safety Management System in compliance with Legislative Decree 81/2008 and its own DVR.



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ILO Convention C187 — Promotional Framework for Safety (2006) [added 2022] promotes a systemic and progressive approach to occupational safety, with an integrated prevention culture. TAVI S.p.A. incorporates this principle into its QA-BRC Integrated Policy and continuous staff training on health and safety themes.

9.3 Human rights due diligence in the supply chain

TAVI S.p.A. adopts an approach proportionate to its size to identify risks of human rights violations in its direct activities and in the supply chain. This approach includes: preliminary assessment of main suppliers with reference to working conditions and compliance with ILO Conventions; insertion of ethical clauses and joint responsibility in contracts with suppliers and subcontractors; monitoring reports received through channels described in Chapter 14. The results of this process feed into supplier selection and renewal decisions.

9.4 Prohibition of illegal labor brokerage and irregular work

Within its logistics and procurement activities, TAVI S.p.A. does not maintain relationships with entities that resort to illegal labor brokerage practices (caporalato), prohibited by Law 199/2016. Supply and subcontracting contracts include specific compliance clauses and provide for the immediate termination of the relationship in case of an established violation.

10. PROTECTION OF CONFIDENTIALITY AND PERSONAL DATA PROTECTION

The protection of personal data is a fundamental value for TAVI S.p.A. and a legal obligation under Regulation (EU) 2016/679 (GDPR) and national alignment legislation (Legislative Decree 101/2018). Respect for privacy concerns data of both employees and collaborators, as well as those of customers, suppliers and third parties with whom the Organization comes into contact.

TAVI S.p.A. processes personal data in compliance with the principles of lawfulness, fairness and transparency; purpose limitation (data are collected for specific, explicit and legitimate purposes); minimization (only data necessary for the purpose are processed); accuracy; storage limitation (not beyond the necessary time); integrity and confidentiality (with adequate security measures). Data subjects are informed about the processing operations concerning them and can exercise the rights provided by the GDPR (access, rectification, erasure, portability, objection).

10.1 Obligations for employees and collaborators

Every employee and collaborator authorized to process personal data is required to operate within the limits of the authorization received, to adopt the security measures established by the Organization and to promptly report to the Management any violation or risk of violation (data breach). Access to corporate IT systems is personal, non-transferable and subject to the utilization rules defined by the Organization.



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10.2 Confidentiality of commercial information

Reserved commercial information of TAVI S.p.A. — price lists, contracts, strategies, technical know-how, customer and supplier data — cannot be disclosed to third parties without written authorization from the Management, both during and after termination of the employment or collaboration relationship. The commitment not to disclose false and tendentious news or comments about the Organization is an integral part of this confidentiality principle.

11. HEALTH, SAFETY AND ENVIRONMENT

The activities of TAVI S.p.A. must be managed in compliance with current legislation for the protection of working conditions, public health and the environment. TAVI S.p.A. is certified ISO 14001:2015 and BRC GSSD Storage & Distribution Issue 4 and commits to ensuring an adequate work environment by adopting all necessary measures, without prejudice to compliance with applicable regulations.

- every production and logistics site operates in compliance with national environmental laws and local regulations in force;
- waste is disposed of in accordance with defined procedures and applicable legislation;
- main environmental impacts are identified and documented, and controls are implemented to reduce them, in relation to solid waste management, hazardous substances, air and water emissions;
- employees are sensitized to the responsible use of energy, water and material resources and commit not to expose others to unnecessary risks for health or safety.

TAVI S.p.A. commits to progressively improving its environmental performance and to involving suppliers and customers in promoting sustainable practices throughout the supply chain.

12. RELATIONS WITH CUSTOMERS, SUPPLIERS AND THIRD PARTIES

TAVI S.p.A. and its employees, in carrying out their respective duties, are required to maintain relationships with all categories of stakeholders acting in good faith, loyalty, fairness and transparency. Information and communications towards the outside must be correct, clear and uniform, respecting the confidentiality needs required by business conduct.

12.1 Relations with customers

TAVI S.p.A. demands that every contact or relationship with clientele be grounded on principles of honesty, professional fairness and transparency. Information on products — including origin, quality and characteristics — is reported faithfully. Commercial communication is truthful and not misleading.

12.2 Relations with suppliers and subcontractors

Relations with suppliers take place in compliance with criteria of impartiality, economic efficiency, transparency, loyalty and fairness, avoiding relationships that could generate personal advantages or conflicts of interest. Suppliers are selected through objective and documented processes. Subcontracting contracts include clauses of joint responsibility and ethical compliance with the principles of this Code.



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12.3 Institutional and external communication

Relations with mass media and external institutional communication — including sustainability evaluation platforms like EcoVadis — are reserved for designated corporate functions or subjects expressly authorized by them, and must be conducted in coherence with corporate strategies.

13. USE OF COMPANY ASSETS AND RESOURCES

Material and immaterial assets of TAVI S.p.A. — plants, equipment, company vehicles, IT systems, software, data, know-how — are resources made available to employees for performing their duties. Every recipient of the Code is responsible for the proper custody and proper use of the corporate resources entrusted to them.

- company assets cannot be used for personal purposes except to a marginal extent and within the modalities permitted by the Organization;
- IT and communication systems (computers, email, mobile devices, networks) are work tools and cannot be employed for illegal activities, defamation, violation of privacy or third-party rights;
- any damage, loss or improper use of company assets must be promptly communicated to the Management;
- technical know-how, processes and strategic information of TAVI constitute protected company assets and cannot be transferred, copied or disclosed without written authorization.

14. INTERNAL CONTROL SYSTEM

The internal control system of TAVI S.p.A. is realized through the set of tools and procedures necessary to direct, manage and verify the Organization's activities, guiding them towards achieving corporate objectives and risk prevention. The system contributes to ensuring compliance with laws, internal procedures, corporate strategies and policies; the achievement of set goals; the protection of material and immaterial heritage; corporate management according to criteria of efficiency and effectiveness; the reliability of accounting and management information inside and outside.

To this end, every operation and transaction, duly authorized and recorded, is verifiable with the support of adequate documentation. Responsibility for the smooth functioning of the internal control system refers to all recipients of the Code within the scope of functions performed. Each employee is required to promptly inform their manager of the emergence of dynamics that could interfere with the correct management of the work activity.

The guarantor of the Code of Ethics and the proper functioning of the system is the Integrated Management Manager (RGI), who reports to the Management and proposes useful initiatives to ensure the dissemination and updating of the Code, promotes staff training and information programs, analyzes reports of possible violations and communicates results to the structures

15. REPORTING CHANNELS AND PROTECTION OF THE WHISTLEBLOWER

The violation of this Code harms the relationship of trust with the Organization and can lead to the activation of disciplinary actions and, where relevant, legal actions against those responsible. All recipients are required to promptly report any news they become aware of



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regarding violations of the Code of Ethics or other corporate provisions that may, in any capacity, involve or harm the Organization, its employees or third parties.

15.1 Available channels

TAVI S.p.A. makes available the following internal reporting channels, accessible to all recipients of the Code:

Channel	Methods	Management and guarantees
Confidential email	segnalazioni@tavi.it (dedicated and confidential mailbox)	Chief Executive Officer — response within 5 working days; guaranteed confidentiality
Reporting box	Physical box at company sites, with restricted access	AMM — periodic collection; anonymity possible

15.2 Confidentiality, whistleblower protection and management

The Company commits to ensuring that no retaliatory or discriminatory acts — direct or indirect — are put in place against the whistleblower for reasons connected, even indirectly, to the report. Reports in bad faith or with calumnious intent are instead disciplinary punishable. Reports received are managed with the maximum confidentiality: the whistleblower's identity is not disclosed without their consent, unless required by law.

TAVI S.p.A. is not subject to the obligation to adopt the formal whistleblowing channel pursuant to Legislative Decree 24/2023 (threshold: more than 50 employees at the time of adoption); however, it voluntarily adopts the whistleblower protection principles established by that legislation as a reference standard. The investigation of every report is documented in the internal register and, where applicable, results in corrective actions or disciplinary proceedings according to Chapter 15.

16. DISCIPLINARY SYSTEM AND IMPLEMENTATION OF THE CODE

Compliance with this Code of Ethics is a binding obligation for all recipients indicated in Chapter 2. The sanctions provided by the CCNL and the specific disciplinary system apply in case of violations of the Code of Ethics. The violation of Code rules may constitute a breach of primary obligations of the employment relationship or a disciplinary offense, with all legal consequences also regarding the retention of the employment relationship, and may entail liability for damages arising therefrom.

16.1 Graduation of sanctions

Disciplinary sanctions are proportionate to the severity of the violation, concrete circumstances and the role held by the person responsible. They can consist of: verbal or written warning; conservative sanction (fine, suspension from service); in the most serious cases, termination of employment for just cause or subjective justified reason, with application of procedures provided by the Workers' Statute (L. 300/1970) and the CCNL. For



TAVI S.p.A.

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collaborators and commercial partners, an established violation can entail contract termination and eventual claim for damages.

16.2 Training, dissemination and periodic review

The Code of Ethics is brought to the knowledge of all those with whom TAVI S.p.A. maintains commercial or other relationships. Every new employee receives it during the onboarding process and signs the acknowledgment form (Annex A). TAVI S.p.A. promotes training and information programs for staff on the contents of the Code, with periodic updates in case of relevant regulatory or organizational modifications. The Code is subject to review at least every three years by the Management, with the support of the RGI.

17. ANNEX A — ACKNOWLEDGMENT AND COMMITMENT FORM

The undersigned _____,
in the capacity of _____ of TAVI S.p.A.,
born in _____ on _____, Tax Code

declares to have received, read and understood the Code of Ethics of TAVI S.p.A.

(COE-TAVI-001, Revision 2, May 2026)

and formally commits to respecting its principles and provisions in the exercise of their functions.

Also commits to:

- report, through channels indicated in Chapter 14, any violation of the Code that they become aware of in the exercise of their activity;
- not perform retaliatory acts against those who make reports in good faith;
- promptly communicate to the Management or to the RGI the emergence of conflict of interest situations, even if only potential;
- update their knowledge of the Code following every revision.

Place and date: _____

Signature: _____

For acknowledgment and acceptance — TAVI S.p.A.:

AMM Signature: _____