

CODE OF ETHICS

Mod. 5.3.1 rev.02

**rothoblaas**

Solutions for Building Technology

For employees, clients and partners

Rothoblaas is an international company operating in the construction sector. We operate in regulated markets with a high level of responsibility, making competence, quality, safety and integrity fundamental to our business.

This Code of Ethics sets out the core principles that guide the way we work and collaborate, both internally and in our external relationships.

It applies to all employees, clients and partners working with Rothoblaas in every country.

It forms an integral part of our compliance system and of the Model adopted pursuant to Italian Legislative Decree 231/2001.

What we do: We develop, manufacture and provide solutions and services to improve construction and working practices in timber construction and work-at-height safety, placing expertise and reliability at the centre of everything we do.

How we do it: These principles guide our day-to-day decisions – how we design, communicate, sell, manage supplies and partnerships, and work together as a team.

Robert Blaas

CEO

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I INDEX

| | |
|--|---|
| 1. Quality and expertise | 4 |
| 2. Fair competition | 4 |
| 3. Respect for people | 4 |
| 4. Responsibility and people policy..... | 4 |
| 5. Environmental responsibility..... | 4 |
| 6. Dialogue and communication | 4 |
| 7. Transparency and traceability | 4 |
| 8. Confidentiality, protection of company assets and data security | 4 |
| 9. Conflict of interest | 5 |
| 10. Corruption and favouritism..... | 5 |
| 11. Relations with authorities | 5 |
| 12. Scope and validity | 5 |
| 13. Addressees | 5 |

1. QUALITY AND EXPERTISE

Quality is a method: products, services and statements must be accurate, verifiable and consistent with applicable technical standards and certifications. Any complaints and non-conformities are handled professionally and with a commitment to continuous improvement.

2. FAIR COMPETITION

We compete fairly and in compliance with market rules. Practices that distort competition or undermine trust between parties are not permitted.

3. RESPECT FOR PEOPLE

We expect a working and collaborative environment founded on respect. We do not tolerate discrimination, abuse or harassment of any kind, including sexual harassment, either within Rothoblaas or throughout our partners' supply chain.

Employees are at the heart of Rothoblaas' corporate culture. The HR Director and the General Manager regularly discuss matters relating to people and organisational issues.

The recruitment process is structured and transparent in order to prevent bias or discrimination. Opportunities for development and promotion are based on merit, skills and performance.

Offensive, discriminatory or harassing behaviour is not tolerated. Rothoblaas supports parenthood and promotes flexible solutions to help balance professional and private life.

4. RESPONSIBILITY AND PEOPLE POLICY

Rothoblaas promotes a balance between the company's economic needs and people's well-being. Managers and supervisors are expected to lead by example, encouraging dialogue, listening and support.

We value professional development, continuous

training, commitment and results. We believe in professional relationships based on mutual trust, shared growth and open discussion.

5. ENVIRONMENTAL RESPONSIBILITY

Rothoblaas operates with a long-term vision focused on environmental and social sustainability. We reduce the environmental impact of our activities, protect health and safety in the workplace, and comply with regulations relating to the environment, quality and safety.

We support social, cultural and educational initiatives and operate transparently also in relation to donations and sponsorship activities.

6. DIALOGUE AND COMMUNICATION

Our approach values authenticity, efficiency and individual contribution. We communicate clearly, accurately and in a verifiable manner.

All employees represent the company externally. Personal opinions must always be clearly identifiable as such.

7. TRANSPARENCY AND TRACEABILITY

Economic, asset and financial information must be accurate, truthful, complete and understandable. Every company transaction must be properly documented and enable the identification of the individuals who proposed, authorised, carried out and verified the transaction itself, particularly in commercial processes, product development and financial flows.

8. CONFIDENTIALITY, PROTECTION OF COMPANY ASSETS AND DATA SECURITY

Rothoblaas protects its tangible and intangible assets, including intellectual property and confidential information. Company assets must be used with care and solely for business purposes.

Personal and company data are processed in compliance with internal procedures and the

principles of security and confidentiality. All employees are required to comply with company policies and to participate in training activities relating to data protection and cybersecurity.

9. CONFLICT OF INTEREST

Anyone working for Rothoblaas must avoid situations in which personal, family or financial interests may influence, or appear to influence, company decisions.

Any potential conflict of interest must be reported in writing and in advance to the relevant manager and to management. Where required, the person concerned must promptly refrain from participating in the relevant transaction or decision in order to ensure impartiality, integrity and transparency.

10. CORRUPTION AND FAVOURITISM

Rothoblaas does not tolerate any form of corruption or favouritism. It is prohibited to offer, promise, receive or accept money, goods or any other undue benefit, directly or indirectly, in order to obtain personal or corporate advantages.

Gifts received are managed transparently and collectively in accordance with company procedures.

Any relationship with organised crime or terrorism, and any activity that facilitates money laundering, even indirectly, is prohibited: all transactions must be lawful and fully traceable.

11. RELATIONS WITH AUTHORITIES

In dealings with Public Authorities and supervisory bodies, we act with integrity. It is prohibited to offer benefits to public officials, obstruct audits or inspections, or induce false or misleading statements.

12. SCOPE AND VALIDITY

This Code of Ethics applies to the entire Rothoblaas Group and forms an integral part of the Organisational Model pursuant to Legislative Decree 231. It is published on the company website and may be updated to reflect organisational or regulatory requirements.

13. ADDRESSEES

The Code of Ethics applies to shareholders, directors, supervisory bodies, management, employees, consultants, suppliers, partners, clients and anyone acting in the name of or on behalf of Rothoblaas.

Any breach of this Code may result in disciplinary, contractual, civil or criminal measures, up to and including termination of the relationship.

Where an employee fails to change their behaviour, the matter must be reported:

- **first to their supervisors,**
- **to management**
- **to the designated persons Health and Safety Representatives,**
- **and finally, if unresolved, to the Supervisory Body (SB).**

Reports may be submitted to the **Supervisory Body (SB)** at the following address: odv.rothoblaas@outlook.com

Reports submitted through the Whistleblowing channel are handled confidentially.

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