MARMOLES MAN
CARRARA

MARMOLES MAN SRL

CODE OF ETHICS

MARMOLES MAN S.R.L.

Approved by the Administrative Body on 15 January 2024

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1. Introduction

The Code of Ethics of MARMOLES MAN SRL (hereinafter also “MARMOLES” or the “Company”) is the corporate ethics instrument whose aim is to formalise the principles and standards of conduct in force within the Company.

The Code is binding on all employees and collaborators of the Company, its suppliers, third parties who in any case have business dealings with it, and external professional consultants.

The Company will supervise the effective observance of the Code, providing adequate information, prevention and control tools, and will guarantee the transparency of the conduct adopted, intervening where necessary to repress any actions not in line with the principles of the Code.

Furthermore, the Code of Ethics forms an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree no. 231/01, adopted by MARMOLES itself.

2. Scope of application

The Code of Ethics sets out the fundamental guidelines that must inspire the activities of MARMOLES and guide the conduct of employees, including collaborators (consultants and third parties in general who have contractual relations with the Company), of the Administrative Body and of the Statutory Auditors (hereinafter the “Addressees”), for the proper functioning, reliability and integrity of the Company and of its business model.

The rules of the Code of Ethics constitute an essential part of the contractual obligations of personnel pursuant to, and for the purposes of, Articles 2104 and 2105[1] of the Civil Code.

MARMOLES assesses, from a disciplinary standpoint and pursuant to current legislation, conduct contrary to the principles set out in the Code of Ethics, applying — in compliance with the Law, the Workers’ Statute and the applicable national collective labour agreement (CCNL) — the sanctions provided for in the Disciplinary System adopted by the Company pursuant to Legislative Decree no. 231/2001.

3. Presentation of the Company and Mission

3.1 Presentation of the Company

Marmoles Man is a supplier of fine marbles based in Massa-Carrara, the cradle of the most renowned marble basins in the world. Since 2011 the company has marketed the finest marbles sourced directly from the Apuan Alps as well as from other parts of the world, establishing itself as a privileged player on the international scene.

[1] Article 2104 of the Civil Code, entitled “Diligence of the employee”, reads: “The employee must use the diligence required by the nature of the work due, by the interest of the enterprise and by the higher interest of national production. The employee must also comply with the provisions for the execution and discipline of work issued by the employer and by the collaborators on whom he is hierarchically dependent”.

Article 2105 of the Civil Code, instead, provides for the employee’s duty of loyalty, stating: “The employee must not conduct business, on his own account or on behalf of third parties, in competition with the employer, nor disclose information relating to the organisation and production methods of the enterprise, or make use of it in such a way as to cause it prejudice”.

With know-how built up over ten years of activity and a cosmopolitan outlook focused on the future, Marmoles Man counts among its main interlocutors the United States, Canada, South America, the Emirates and Asia, as well as, of course, Europe.

In Tuscany the company has a workshop for processing materials and a showroom of more than 4,000 square metres for the display and sale of the finest blocks and slabs available on the market.

3.2 Mission

To provide our counterpart with exactly what they are looking for. In other words: sourcing the best materials in Italy and around the world, processing them in the best possible way and guaranteeing a unique, high-quality product, ideal for realising a variety of architectural projects according to the client's needs.

4. Reference values for the Company

Compliance with laws and regulations

The Company's essential principle is compliance with all laws and regulations applicable to it. Every employee of the Company must first commit to complying with the laws and regulations in force.

This commitment shall also apply to consultants, collaborators, suppliers, client companies or institutions, and to anyone having relations with the Company.

The Company attaches considerable importance and value to the democratic principles and free political self-determination on which the State is founded, opposing any conduct that may constitute, or be linked to, terrorism or subversion of the democratic order of the State, or that may constitute, or be linked to, transnational crimes relating to criminal association, including of the mafia type, or to personal aiding and abetting. MARMOLES also firmly opposes any conduct involving the use, replacement or transfer, in business activities, of money, goods or other benefits deriving from the commission of an offence, prohibiting its employees, including managers, members of corporate bodies, all collaborators and, in any case, all Addressees of this Code from committing, or taking part in, acts relating to money laundering, self-laundering, receiving stolen goods and the use of money, goods and other benefits of unlawful origin. Anyone who becomes aware of the commission of any of the acts or conduct described above must immediately inform the Supervisory Body, in the manner expressly indicated in the "Management of Reports" Procedure, which is to be considered an integral part of the Organisation, Management and Control Model adopted by the Company.

Respect for the person

MARMOLES regards the protection of the physical integrity of the person, of freedom and of individual personality as a primary value. Accordingly, in carrying out its activities, the Company repudiates any conduct that may determine, or contribute to determining, an injury to individual physical integrity or the exploitation of the person. Anyone who, in carrying out their duties or tasks, becomes aware of the commission of any of the acts or conduct described above must promptly inform the Supervisory Body in the manner expressly indicated in the "Management of Reports" Procedure.

Fairness and honesty

MARMOLES operates in compliance with professional ethics and internal regulations. The pursuit of the Company's interest can never justify conduct contrary to the principles of fairness and honesty; for this reason, any form of benefit or gift, whether received or offered, that could be understood as a means of influencing the independence of judgement and conduct of the parties involved is refused. Gifts and other representation expenses are permitted provided they are kept within limits such that they do not compromise the integrity and ethical-professional fairness of the parties and, in any case, provided they may be considered customary in relation to the occasion and of modest value.

Impartiality, equality and non-discrimination

MARMOLES, in full compliance with the principle of good faith, operates impartially in the exercise of its activities, also adopting a composition and organisational structure that guarantee the principle of independence of judgement and the absence of any commercial and financial interest that could give rise to partisan conduct, preferential treatment or disparity. In relations with all counterparties, the Company avoids any discrimination based on age, racial and ethnic origin, nationality, political and trade-union opinions, religious beliefs, sex, sexual orientation or the state of health of its interlocutors. In general and in every case, any act of propaganda, incitement or encouragement of discrimination or violence on racial, ethnic, national or religious grounds is prohibited, where such acts, carried out in a manner that gives rise to a concrete danger of dissemination, are based wholly or partly on the denial, serious minimisation or glorification of the Shoah or of the crimes of genocide, crimes against humanity and war crimes as defined respectively by the Statute of the International Criminal Court, ratified by Law no. 232 of 12 July 1999

Confidentiality and protection of personal data

The Company guarantees, in accordance with the provisions of law, the confidentiality of the information in its possession. Employees, including managers, members of corporate bodies and all other collaborators are obliged to treat as strictly confidential the information and data acquired and processed in the course of their employment or collaboration, which must therefore remain appropriately protected and may not be used for purposes unconnected with the exercise of their professional activity, with a prohibition on communicating or disclosing such information both inside and outside the Company, except in compliance with current legislation and company procedures. Furthermore, the Company guarantees a high level of security in the selection and use of its information technology systems, intended for the processing of personal data and confidential information, and declares that it has adopted all the security measures required by the laws currently in force for their protection. By way of non-exhaustive example of the categories of information and data subject to the above obligations and prohibitions, reference is made to: data relating to staff, clients and suppliers, and in general all data defined as personal by national and international legislation on the protection of privacy, with particular attention to those that the law itself defines as sensitive; company performance and productivity parameters; corporate agreements, commercial agreements and contracts, company documents; know-how relating to the planning of relations with operators in the relevant sector and to the development of the network with them.

Conflicts of interest

In carrying out its activities, the Company operates by avoiding any situation of conflict of interest, whether actual or merely potential. Addressees of the Code of Ethics must avoid situations in which conflicts of interest could arise between their personal economic activities and the duties they perform within the Company.

Environmental protection

The Company is aware of the impact of its activities on the economic and social development and on the quality of life in the area concerned. For this reason, in carrying out its activities, MARMOLES undertakes to strictly comply with all environmental legislation and regulations applicable to its sector, safeguarding the surrounding environment and contributing to the sustainable development of the territory. In this respect, for the disposal of waste produced, the Company ensures the prior technical-professional qualification of the suppliers used, as well as the inclusion of specific contractual clauses (clause 231) requiring them to comply with all applicable environmental regulations, with the procedures provided for, and with the ethical principles defined by MARMOLES.

Diligence and good faith

Every employee and collaborator must act loyally and in good faith, conducting their activities in accordance with the principles of fairness and integrity and honouring their contractual obligations. They must also know and observe the content of this Code of Ethics, conducting themselves with respect, cooperation and mutual collaboration with all their interlocutors.

Documentation of activities

All activities, actions, transactions and operations relating to the Company must be:

- carried out in compliance with applicable rules, with the utmost managerial fairness, with completeness and transparency of information, and with lawfulness, both formal and substantive;
- adequately traceable and documentable, also in relation to the subject matter to which they refer;
- carried out in compliance with the instructions, procedures and communications given, and within the limits of the powers delegated and of the approved budgets.

Anyone who becomes aware of any omissions, alterations or falsifications of accounting records or of the related supporting documents must promptly inform their superior, or the head of the competent company function, and the Company's Supervisory Body.

Competition and free competition

MARMOLES recognises the fundamental importance of a competitive market and, in compliance with national and EU antitrust legislation, the guidelines and directives of the Italian Competition Authority, as well as the policies drawn up by the Company, does not engage in conduct, nor enter into agreements with other companies, that could adversely affect competition among the various operators in the relevant market. In particular, the Company and the Addressees avoid practices (creation of cartels, market sharing, limitations on production or sales, conditional agreements, etc.) that would constitute a breach of competition law, and likewise avoid any other conduct that could distort competition in the acquisition of goods and services, for example through the corruption of private contractual counterparties. All Addressees must also refrain from exerting undue pressure, threats, acts of violence, artifice, fraudulent means or any other conduct that could in any way prevent or

disrupt the commercial and business activity of others or the free exercise of competition on the market.

5. Codes of conduct

5.1 Administrative operations and financial transactions

5.1.1 Conduct of commercial operations and transactions

Every operation and/or transaction, understood in the broadest sense, must be lawful, authorised, consistent, appropriate, documented, recorded and verifiable at all times.

Collaborators must comply with the operating procedures and protocols in place to safeguard the formation and implementation of the Company's decisions.

The procedures governing operations must allow checks to be carried out on the characteristics of the transaction, on the reasons that made its execution possible, and on the authorisations for carrying it out and on its execution.

Anyone who carries out operations and/or transactions involving sums of money, goods or other economically valuable benefits belonging to the Company must act under specific authorisation and provide, upon any valid request, evidence allowing verification at any time.

Each collaborator is responsible for the truthfulness, authenticity and originality of the documentation and information provided in the course of their area of responsibility.

To ensure compliance with the above principles, and with the broader aim of preventing the offences provided for in Legislative Decree no. 231/2001, all operations and transactions carried out by employees (including managers), members of the Corporate Bodies and collaborators in the course of their activities must conform to the following general principles:

- **traceability:** the formation of acts and of the information and documentary sources used in support of the activity carried out must be reconstructable, guaranteeing the transparency of the choices made. The Company must ensure the verifiability, documentability, consistency and appropriateness of every operation and transaction. To this end, traceability of the activity must be guaranteed through adequate documentary support on which checks can be carried out at any time. It is therefore appropriate that, for each operation, it can easily be identified who authorised the operation, who materially carried it out, and who carried out a check on it;
- **separation of duties:** there must be no subjective identity between those who take or implement decisions, those who must record the accounting entries for the decisions taken, and those who are required to carry out the checks on them provided for by law and by the procedures contemplated by the internal control system;
- **signing powers and authorisation powers:** formalised rules must exist for the exercise of signing powers and internal authorisation powers. Furthermore, it is necessary that:
  - no one is granted unlimited powers;
  - powers and responsibilities are clearly defined and known within the organisation;
  - authorisation and signing powers are consistent with the organisational responsibilities assigned;

- **archiving/keeping of documents:** documents relating to the activity must be archived and kept by the competent function in such a way as not to permit subsequent modification, unless with specific evidence;
- **confidentiality:** access to the documents already archived, referred to in the preceding point, must be justified and allowed only to the person competent under the law and internal rules;
- **reporting system:** those called upon to carry out the various activities must account for their work;
- **monitoring:** a check must be carried out on the activity performed, which in turn must be appropriately documented and traced.

5.1.2 Administrative checks and documentation

MARMOLES has in particular the duty to record and keep in its archives administrative, economic and financial information.

Those entrusted with keeping the accounting records are required to make every entry accurately, completely, truthfully and transparently, and to allow any checks by persons, including external ones, appointed for that purpose.

The accounting and reporting criteria must be consistent with one another, in order to provide a uniform basis for the evaluation, management and communication of the operations carried out by the company.

MARMOLES has set out specific obligations, to be taken as a reference for compliance with the above principles:

- to comply, in carrying out the tasks entrusted to them, with the provisions of the law, of the Code of Ethics, and of the established accounting, reporting and control procedures;
- to be precise, timely and thorough in preparing and keeping documents, and to include in them all data and/or information in any way relevant to the adoption of MARMOLES' decisions;
- before signing a document, to make sure that the information contained in it is truthful, correct, complete and compliant with what is required by the laws on the subject;
- before committing MARMOLES to any commercial operation, or reporting administrative and financial information, to make sure to obtain all the necessary authorisations and to document them appropriately;
- to keep safe all documents, including information held by the Company on computer media;
- to assist the control bodies and any other person authorised to access the documentation within their competence, and to provide them with precise and exhaustive information.

5.1.3 Purchase of goods and services

The selection of suppliers and the definition of the terms of purchase of goods and services for the Company are governed by values and criteria of competition, objectivity, fairness, integrity, ethics, respectability and reputation, impartiality, and fairness of price and of the quality of the good and/or service, carefully assessing the guarantees of assistance and the overall range of offers. In particular, the existence of these requirements will be verified before the contractual relationship with suppliers is established and subsequently during the course of the

contractual relationship.

Purchasing processes must be aimed at obtaining the greatest competitive advantage for the Company and must be based on loyalty and impartiality towards every supplier meeting the required criteria. Anyone who makes any purchase of goods and/or services, including external consultancy and collaboration, must always act in compliance with the above principles, with due diligence, and refrain from receiving, concealing or substituting money, goods or other benefits of unlawful origin.

The Company furthermore firmly condemns the purchase of goods deriving from any offence, and puts in place specific safeguards and controls to prevent it.

5.1.4 Methods of collection and payment

Collections and payments must always be made through bank transfers and/or bank cheques and, where made in cash, must always be documented and comply with the statutory limits.

5.2 Relations with personnel

The Company recognises the value of human resources, respect for their autonomy and the importance of their contribution to MARMOLES' activities.

The Company opposes any discriminatory conduct or attitude that is injurious to the person, to their beliefs or to their preferences. MARMOLES, moreover, considers absolutely unacceptable and therefore prohibits any kind of harassment or unwanted conduct, such as those connected with race, sex or other personal characteristics, which has the purpose or effect of violating the dignity of the person towards whom such harassment or conduct is directed, both inside and outside the workplace.

The Company undertakes to ensure the conditions necessary for a collaborative and non-hostile working environment, and to prevent discriminatory conduct of any kind. The cooperation of all is required in order to maintain an atmosphere of mutual respect for each person's dignity, honour and reputation.

The Company also undertakes to safeguard working conditions by protecting the physical and psychological integrity of the worker, respecting their moral personality, and preventing it from being subject to unlawful pressure or undue hardship.

5.2.1 Selection and recruitment of personnel

Without prejudice to the obligations arising from current provisions, the selection of personnel is subject to verification that candidates fully match the professional profiles required by the company, in compliance with equal opportunities for the persons concerned.

Within the limits of the information available, the Company adopts appropriate measures to avoid favouritism, nepotism or patronage in the selection and recruitment phases.

Personnel are recruited under regular employment contracts inspired by the provisions of the applicable national collective labour agreement (CCNL) and in full compliance with the rules on working hours, rest periods and holidays. No form of employment relationship that does not conform to, or that in any way circumvents, the current legal provisions is permitted. In this respect, the Company firmly condemns the use, hiring or employment of labour through any form of unlawful intermediation — including that sanctioned by Art. 603-bis of the Criminal Code (so-called caporalato, or gangmastering) — involving the exploitation of the worker and

taking advantage of any state of need in which they may find themselves.

5.2.2 Employment of irregular workers

The Company also considers it an inviolable principle to employ only personnel who are fully compliant with current immigration rules and, in particular, with Legislative Decree no. 286/1998, whose Art. 22, paragraph 12-bis, was included among the offences covered by Legislative Decree no. 231/01 from August 2012. In light of the above, all Addressees of this Code must adopt the following conduct:

- not to employ human resources who are not in compliance with the current provisions on residence permits and/or who cannot show a valid residence permit;
- to require all suppliers, engaged to provide services or works in accordance with the provisions and regulations adopted by the company, to use exclusively personnel who are in compliance with the current provisions on residence permits and/or who can show a valid residence permit.

In any case, it is prohibited to carry out acts aimed at unlawfully procuring the entry of foreigners into the territory of the State and/or at facilitating their stay in it in breach of Legislative Decree no. 286/1998.

5.2.3 Duties of personnel

Personnel undertake to comply with the obligations set out in the Code of Ethics and, in carrying out their tasks, must observe the law and base their conduct on the ethical principles of diligence, good faith, integrity, fairness and loyalty, and on all those set out in this Code.

All addressees of the Code of Ethics must work to maintain a dignified working environment in which the dignity of each person is respected.

In particular, the Company's personnel:

- must not work under the influence of alcohol or narcotic substances;
- must be considerate of the needs of those who may suffer physical discomfort from the effects of “passive smoking” in the workplace;
- must avoid conduct that could create an intimidating or offensive atmosphere towards colleagues or subordinates, with the aim of marginalising or discrediting them in the workplace.

5.2.4 Competition and adverse publicity

Employees, members of corporate bodies and all other collaborators are prohibited from entering into relations with, or providing information to, other companies in ways that could cause harm or prejudice to MARMOLES.

The Company's employees may not provide advice, studies or collaboration to operators in the sector, even free of charge, unless expressly authorised by the Company, which in any case reserves the right to assess any such engagement in relation to possible incompatibilities, as required by law and internal regulations.

5.2.5 Gifts, presents and other benefits

An employee may not request, for themselves or for others, gifts or other benefits, nor accept them, except for customary items of modest value or those conforming to normal commercial and courtesy practices, from anyone who has benefited or may in any way benefit from the

company's activities.

An employee may likewise not offer gifts or other benefits to any persons from whom they could obtain preferential treatment in the conduct of any activity connected with that of the Company.

5.2.6 Confidentiality and protection of company data

The Company guarantees, in accordance with the provisions of law, the confidentiality of the information in its possession. Addressees are prohibited from using confidential or privileged information before it has been formalised, authorised or communicated to the parties concerned, for purposes not connected with the exercise of their activities or duties within the Company.

Furthermore, the Company guarantees a high level of security in the selection and use of its information technology systems, intended for the processing of confidential information, and declares that it has adopted all the security measures required by the laws currently in force for their protection.

The categories of information and data subject to confidentiality obligations and to the prohibition on communication and disclosure to third parties include, by way of non-exhaustive example: agreements and contracts with suppliers and third parties; economic transactions; company documents of a strictly confidential nature; information covered by professional secrecy; know-how relating to the planning of relations with operators in the relevant sector and to their development; judicial and administrative proceedings involving the Company; information concerning the performance of institutional activities and the granting of contributions; information concerning the internal organisation and the management of the Company's tangible and intangible assets.

5.2.7 Protection of personal data and management of reports containing such data

The Company protects the privacy of its employees in accordance with the rules in force on the subject, undertaking not to communicate or disseminate their personal data, save as required by law, without the prior consent of the data subject. To this end, employees, members of corporate bodies and all other collaborators are obliged to treat as strictly confidential the information and data acquired and processed in the course of their employment or collaboration with the Company, which must therefore be appropriately protected and may not be used for purposes unconnected with the exercise of their professional activity, with a prohibition on communicating or disclosing them, both inside and outside the Company, except in compliance with current legislation and company procedures. The acquisition, processing and storage of such data take place within specific procedures designed to ensure full compliance with privacy rules and to prevent unauthorised persons from becoming aware of them. In this respect, the Company guarantees compliance with Legislative Decree no. 196/2003 and furthermore conforms to the requirements on the processing of personal data introduced by the European Regulation 2016/679. In force since 25 May 2018, the General Data Protection Regulation (hereinafter also simply the “Regulation” or “GDPR”) is directly applicable in all Member States of the European Union.

Lastly, in accordance with Law no. 179 of 30 November 2017 (“Provisions for the protection of persons who report offences or irregularities of which they become aware in the context of a public or private employment relationship”), the Company guarantees the protections introduced by the new legislation for the reporting person (so-called whistleblower). In

compliance with the new Art. 6, paragraph 2-bis, of Legislative Decree 231/2001, the Company has provided for the imposition of sanctions in case of breach of the measures protecting the reporting person, as specified in the Disciplinary System.

5.2.8 Information obligations

All employees are obliged to report promptly and confidentially to their head of function and/or to the Supervisory Body any information of which they become aware in the course of their work activities concerning violations of legal rules, of the Code of Ethics or of other company provisions that may, for any reason, concern the Company.

Heads of function must supervise the work of their employees and must constantly and promptly inform the Governing Body and the SB of any violations referred to in the preceding paragraph.

5.2.9 Use of computer or electronic systems

Maintaining a good level of IT security is essential to protect the information the Company uses on a daily basis and is vital for the effective development of the company's business policies and strategies. The use of IT or electronic tools and services assigned by the Company must take place in full compliance with the current rules on the subject (in particular on computer offences, IT security, privacy and copyright) and with internal procedures. With regard to the use of IT systems, each employee is responsible for the security of the systems used and is subject to the regulations in force, to the terms of licence agreements and to any internal regulations for the use of company technological resources. Save as provided by civil and criminal law, the use of network connections for purposes other than those relating to the employment relationship, or for sending offensive messages or messages that could damage the image of the company, constitutes improper use of company assets and resources. Employees and collaborators undertake not to use for private interests or purposes the IT assets or equipment made available to them for official reasons.

5.2.10 Use of personal computers, mobile communication systems and other devices

In order to avoid the serious risk of introducing, or altering the stability of, the applications of the computer, all employees of the Company:

- – are not permitted to install programs of any kind unless expressly authorised by the Company;
- – are not permitted to use programs not officially distributed by the Company;
- – are not permitted to use software and/or hardware tools designed to intercept, falsify, alter or suppress the content of computer communications and/or documents;
- – are not permitted to modify the configurations set on their PC;
- – are not permitted to download files contained on magnetic/optical media that have no connection with their work.
- – are not permitted to use software and/or hardware tools designed to intercept, falsify, alter or suppress the content of computer communications and/or documents.

5.2.11 Use of the company network

Network drives are areas for sharing strictly professional information and may in no way be used for other purposes. The Company reserves the right to remove any file or application that it considers dangerous to the security of the system, or that has been acquired or installed in

breach of this Code.

5.2.12 Use of the Internet network and related Internet browsing services

Employees (including managers) of the Company:

- – are not permitted to browse websites unrelated to the performance of their assigned duties;
- – are not permitted to download free software (freeware and shareware) taken from Internet sites, unless expressly authorised by the Company;
- – any form of registration with websites whose content is not related to the work activity is prohibited;
- – participation, for non-professional reasons, in forums, use of chat lines, electronic bulletin boards and entries in guest books, including under pseudonyms (or nicknames), is not permitted;
- – the storage of computer documents of an offensive and/or discriminatory nature on grounds of sex, language, religion, race, ethnic origin, opinion and trade-union and/or political affiliation is not permitted;
- – connecting to, or in any case accessing, websites whose content could give rise to offences against the person is strictly prohibited in all cases.

5.2.13 E-mail

Noting that e-mail is also a work tool, it is considered useful to point out to all employees (including managers) and collaborators who use the company's information systems that:

- – it is not permitted to send or store messages (internal and external) that are offensive to common morality and/or discriminatory on grounds of sex, language, religion, race, ethnic origin, opinion and trade-union and/or political affiliation;
- – the use of the company e-mail address to take part in debates or forums is not permitted.
- – the use of e-mail for reasons unrelated to the performance of assigned duties is not permitted.

5.2.14 Mobile telephony

The Company's telephone communication devices, whether fixed or mobile, must be used for exclusively professional purposes, unless otherwise expressly authorised by company regulations or policies.

6. Relations with private parties

In addition to interactions with entities belonging to public administrations, the Company undertakes to combat corruption also in its relations with private companies and bodies, in accordance with Articles 2635 and 2635-bis of the Civil Code, which constitute further predicate offences of the administrative liability of entities pursuant to Legislative Decree no. 231/2001. To this end, MARMOLES has defined specific rules of conduct to prevent their commission, and has also identified specific sensitive activities within the various company processes through which they could be committed by senior or subordinate personnel. For details of these, reference is made to the Model 231 approved by the Administrative Body of

the Company and to the related control protocols contained therein.

The Company nevertheless firmly prohibits the following conduct, given by way of non-exhaustive example:

a) a) simulating fictitious expenses, or expenses exceeding those actually incurred, in order to create off-book funds with which to give or promise money to directors, general managers, executives responsible for preparing corporate accounting documents, statutory auditors or liquidators of private companies (Art. 2635, paragraph 1, of the Civil Code), or to persons subject to the direction or supervision of any of the persons mentioned above (Art. 2635, paragraph 2, of the Civil Code), so that they perform or omit acts in breach of the duties of their office or of their duties of loyalty;

- b) purchasing goods or services intended to be given to senior persons of private companies or to persons subject to their direction or supervision, in order to obtain from them conduct that is disloyal and economically disadvantageous for the companies to which they belong;

c) c) giving or promising money or other benefits to senior persons, or to persons subject to their direction or supervision, in order to obtain from them an advantage for the Company, by omitting acts in breach of the duties of their office or of their duties of loyalty, and causing harm to the company to which they belong.

Lastly, as a further safeguard in this respect, MARMOLES requires its suppliers and third parties to undertake to comply with the rules and principles listed above, where it uses them to carry out sensitive activities that could potentially have an impact on the commission of the offence in question.

6.1 Relations with suppliers

The conclusion of any contract with a supplier must always be based on extreme clarity, avoiding, where possible, the assumption of contractual obligations that give rise to forms of mutual dependence.

Acceptance of the Code of Ethics is a necessary precondition for establishing and maintaining supply relationships.

The Company requires its suppliers of goods and services to fully respect ethics, commercial fairness and legality, with particular reference to the laws protecting industrial and intellectual property, the laws protecting consumers, free competition and the market, and the laws combating money laundering and organised crime, as set out in the Code of Ethics.

The products and/or services supplied must in all cases respond to concrete, justified business needs, motivated and explained in writing by the respective managers responsible for committing expenditure, within the limits of the available budget.

At the end of the relationship and, in any case, before payment of the relevant invoice, the Company verifies the quality, appropriateness and timeliness of the service received and the fulfilment of all obligations assumed by the supplier, also complying with the requirements of tax legislation.

In its relations with suppliers, the Company therefore undertakes to:

- comply with the administrative laws and regulations in force concerning relations with suppliers;
- not preclude any company that meets the requirements from the possibility of being awarded MARMOLES' supply contracts;
- evaluate suppliers' offers on the basis of technical competence, quality, reliability, service, economic convenience and loyalty;
- seek the cooperation of suppliers in constantly ensuring that MARMOLES' requirements are met in terms of quality and delivery times, in compliance with freely agreed rules;
- respect licence agreements and industrial property rules, including those applicable to software;
- inform their direct superiors if employees of the Company are offered gifts that exceed the mere symbolic value of courtesy;
- not disclose information that, by decision of the Company or under agreements with the supplier, must remain confidential.

The Company establishes with its suppliers a relationship characterised by a high level of professionalism, based on availability, respect, courtesy, maximum cooperation and compliance with laws and regulations.

The criteria for selecting suppliers are based on fairness and impartiality of judgement. Selection is based on an assessment of the quality and economy of the services, technical and professional suitability, respect for the environment and the social commitment shown, in accordance with the rules laid down in specific regulations and procedures.

In carrying out existing commercial relations, or when entering into new relations with suppliers, on the basis of publicly available information and/or information available under current regulations, the Company:

- does not maintain relations with persons involved in unlawful activities, or with persons lacking the necessary requirements of commercial seriousness and reliability;
- does not maintain financial or commercial relations with persons who, even indirectly, hinder human development and contribute to violating the fundamental rights of the person.

Personnel shall adopt all appropriate tools and precautions to guarantee the transparency and fairness of commercial transactions. In particular, it is mandatory, among other things, that:

- – the minimum requirements set and required for selecting the parties offering goods and/or services that the Company intends to acquire are scrupulously respected;
- – the criteria for evaluating offers are established;
- – with regard to the commercial/professional reliability of suppliers and partners, all necessary information is requested and obtained.

6.2 Relations with customers

Employees, in their relations with customers, must promote maximum customer satisfaction, providing, among other things, comprehensive, truthful and accurate information about the products and services supplied, undertaking and guaranteeing that the characteristics of the products and services provided to customers correspond to that information, so as to enable informed choices.

Relations with customers are managed on the basis of principles of maximum cooperation, availability, professionalism and transparency, in compliance with confidentiality and the protection of privacy, in order to lay the foundations for a solid and lasting relationship of mutual trust.

MARMOLES undertakes to guarantee adequate quality and safety standards for its products and services, periodically monitoring perceived quality and full conformity (in terms of origin, provenance, quality and quantity) of such services/products with the requirements laid down in the above quality and safety standards, in its contractual standards and in its commercial and advertising communications in general.

It is prohibited for all Addressees of this Code to be involved, in any capacity, in the marketing of products and services having characteristics (in terms of origin, provenance, quality or quantity) different from those declared or agreed, or bearing names, trademarks or distinguishing signs capable of misleading the end consumer as to the quality, origin and provenance of the products/services offered.

Addressees are prohibited from giving or accepting gifts, handing out money or benefits of any kind, in order to win or retain business or to obtain an undue advantage in relations with their customers.

Specifically, it is prohibited to give gifts, hand out money or benefits of any kind to employees of customer companies in order to induce such persons to perform acts contrary to their official duties and/or their duties of loyalty.

7. Relations with the Public Administration

7.1 Integrity and independence in relations

In order to ensure maximum clarity in relations with the Public Administration (hereinafter also “P.A.”), and to safeguard the Company's overall interests, relations with the P.A. are conducted exclusively through persons who are not in a situation of conflict of interest with respect to the representatives of those institutions, and whose duties and related activities require dealings with public administration bodies. Gifts or acts of courtesy and hospitality towards representatives of governments, public officials and public employees are permitted to the extent that their modest value does not compromise the integrity, independence or reputation of either party. In any case, this type of expenditure must be adequately documented and justified.

In the course of any business negotiation, request or relationship of any kind with the Public Administration, no action may be taken, directly or indirectly, that could offer employment and/or business opportunities from which benefits could accrue, for themselves or others, to employees of the Public Administration or to their relatives or in-laws.

7.2 Legality, fairness and transparency

The Company inspires and adapts its conduct to the principles of legality, fairness and transparency, so as not to induce the Public Administration to breach the principles of impartiality and good administration to which it is constitutionally bound.

7.3 Benefits and gifts

The Company condemns any conduct, by whomsoever carried out, consisting in promising or offering, directly or indirectly, gifts and benefits (money, objects, services, performances, favours or other benefits) to Italian or foreign public officials and/or persons in charge of a public service from which an undue or unlawful interest and/or advantage for the Company may arise.

7.4 Institutional relations

Relations with local, national or international institutions are based on the utmost transparency and fairness.

Relations with the political bodies of public institutions are limited to the functions assigned, in strict compliance with the provisions of law and regulations, and may in no way compromise integrity and reputation.

To this end, the Company undertakes not to offer, directly or through intermediaries, sums of money, other means of payment or other benefits to public officials or persons in charge of a public service in order to influence the performance of their duties.

These requirements may not be circumvented by resorting to other forms of contribution that, in the guise of sponsorships, appointments and consultancies, advertising, etc., pursue the same aims prohibited above.

7.5 Business negotiations

In the context of any business negotiation, request or relationship with the Italian and/or foreign Public Administration, conduct aimed at unlawfully influencing the decisions of public officials or persons in charge of a public service, in order to obtain an undue or unlawful profit or advantage for the Company, is prohibited.

By way of example, in the course of any business negotiation, request or commercial relationship with Italian or foreign public officials and/or persons in charge of a public service, the following may not be undertaken

- directly or indirectly — the following actions:
- considering or proposing — in any way — employment and/or business opportunities that could benefit public officials and/or persons in charge of a public service, or their relatives or in-laws;
- offering gifts, unless of modest value;
- allowing the Italian or foreign public official with whom the business negotiation is under way, including by abusing their status or powers, to induce company or senior personnel to give or promise to them, or to a third party, money or other benefits undue, in breach of Art. 319-quater of the Criminal Code;
- soliciting or obtaining confidential information that could compromise the integrity or reputation of either party;
- carrying out any other act aimed at inducing Italian and foreign public officials to do, or to refrain from doing, anything in breach of the laws of the legal system to which they belong;
- abusing one's position or powers to induce or compel someone to promise, undue to oneself or to others, money or other benefits.

7.6 Computer systems of the Public Administration

In carrying out their activities, employees, consultants and collaborators of the Company are prohibited from altering the operation of any computer or electronic system of the Public Administration or from manipulating the data contained in it.

7.7 Funding, grants and subsidies

It is prohibited to use contributions, subsidies or funding obtained from the State, from another public body or from the European Communities for purposes other than those for which they were granted.

MARMOLES condemns conduct aimed at obtaining the Company's accreditation and/or any kind of contribution, funding or other payment (from the State, the European Community or any other national or foreign public body) by means of altered or falsified declarations and/or documents, through omitted information or, more generally, through artifice or deception, including that carried out by means of a computer or electronic system, aimed at misleading the paying body.

Persons responsible for functions must monitor all confidential information of which they become aware, and must log and report every document they draw up and/or send to the Public Administration and to public bodies in general, in compliance with the law and internal procedures.

7.8 Participation in legal proceedings

In the event of participation in legal proceedings, MARMOLES undertakes to act fairly, in compliance with the law, with the rules set out in this Code of Ethics and with internal procedures.

In particular, in the course of legal proceedings in which the Company is involved as a party, employees (including managers), members of corporate bodies and collaborators are prohibited from:

- – promising/giving to a public official (e.g. a magistrate, court clerk or other official), for themselves or for a third party, a sum of money or other benefit in exchange for an act of their office, in order to obtain an advantage for the Company in the legal proceedings;
- – promising/giving to a public official (e.g. a magistrate, court clerk or other official), for themselves or for a third party, a sum of money or other benefit in order to make them omit or delay an act of their office, or to make them perform an act contrary to their official duties, in order to obtain an advantage for the Company in the legal proceedings;
- – misleading the State or another public body, by artifice or deception, in order to obtain an advantage for the Company in the legal proceedings;
- – altering (in any way) the operation of a computer/electronic system, or intervening (without right and in any way) on data, information or programmes contained in or relating to a computer/electronic system, in order to obtain an advantage for the Company in the legal proceedings.

8. Accounting, financial statements and management of tax risk

In full compliance with current regulations, MARMOLES holds as a fundamental value the observance of the principles of truthfulness and fairness with regard to any document setting out the Company's own economic, equity and financial values. To this end:

- The Company adopts an internal system for measuring and controlling tax risk, through operating methods aimed at assigning specific roles and responsibilities to internal functions in the context of tax obligations, including where these are delegated to external consultants and tax firms. To this end, the functions responsible carry out a periodic review of the tax rules applicable to the Company, in accordance with a defined schedule;
- The Company condemns any conduct aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law and addressed to shareholders, the public and the company performing the statutory audit;
- All persons called upon to prepare the aforementioned documents must verify, with due diligence, the correctness of the data and information that will subsequently be incorporated into the preparation of the documents indicated above;
- Accounting and administrative procedures must be adopted that ensure easy and immediate control over compliance with the “Accounting Principles” issued by the specialist committees of the National Councils of Chartered Accountants and Bookkeepers;
- The bodies responsible for preparing the financial statements and corporate communications must carry out their work in compliance with internal procedures, inspired by the principles of fairness and good faith, that is, acting with the ordinary diligence of a prudent administrator.
- They must also avoid situations of conflict of interest, even if only potential, in the performance of their functions;
- The Company requires that the Administrative Body, managers, collaborators and employees conduct themselves fairly and transparently in carrying out their functions, especially in relation to any request made by shareholders, other control bodies and the auditing firm in the exercise of their respective institutional functions;
- It is prohibited to engage in any conduct aimed at causing harm to the integrity of the company's assets;
- It is prohibited to carry out any act, simulated or fraudulent, aimed at influencing the will of the members of the shareholders’ meeting in order to bring about an irregular formation of a majority and/or a different resolution;
- Anyone who is aware of violations of the above provisions, including where they involve unrelated third parties, must inform their direct superior, the Supervisory Body and the competent bodies, which are vested with the necessary powers to carry out preliminary investigations;
- Everyone must keep confidential the information and documents acquired in the course of their duties, and must not use them for their own advantage;

- Persons responsible for transmitting documents and information during audits and inspections by the competent public authorities must conduct themselves in good faith and fairness, and are required to carry out their task with the diligence of an agent.
- They must also maintain an attitude of maximum availability and cooperation towards inspection and control bodies;
- It is prohibited in any way to obstruct the functions of the public supervisory authorities that come into contact with the Company in the course of their institutional functions.

9. Health and safety at work

In carrying out its activities, the Company undertakes to protect the moral and physical integrity of its employees, consultants, collaborators and all its interlocutors.

To this end, MARMOLES ensures that its employees, members of corporate bodies and collaborators carry out their activities in working environments suitable for safeguarding their health, safety and physical and moral integrity, in accordance with laws and regulations in force. For this purpose, it promotes responsible and safe conduct and adopts all the safety measures required by technological developments to guarantee a safe and healthy working environment, with the specific aim of preventing and, above all, impeding the offences of negligent homicide and serious or very serious negligent personal injury committed in breach of the rules on the protection of health and safety at work.

The Company therefore fulfils all the legal obligations provided for by Legislative Decree no. 81/2008 (Consolidated Safety Act).

10. Implementation of the Code of Ethics, control and sanctions

10.1 The Supervisory Body

The activity and function of the Supervisory Body are governed by a dedicated regulation. The Supervisory Body is the body responsible for the operation, control, maintenance and updating of the Organisational Model, and therefore of its constituent elements, pursuant to Legislative Decree no. 231/2001. The Code of Ethics is a constituent element of the Model itself.

In the exercise of its functions, the Supervisory Body will have free access to the Company's data and information useful for carrying out its activities.

The corporate bodies and their members, employees, collaborators and third parties acting in the name and on behalf of the Company are required to give maximum cooperation in facilitating the performance of the Supervisory Body's functions.

10.2 Knowledge and application

This Code of Ethics is brought to the attention of all Addressees.

Any doubts about the application of this Code must be promptly discussed with company management, in cooperation with the Supervisory Body.

Under no circumstances may acting for the benefit of the Company justify the adoption of conduct in conflict with the Code of Ethics.

All Addressees must work to ensure that these rules are properly applied and observed.

10.3 Information obligations towards the Supervisory Body

Anyone who becomes aware of violations of the principles of this Code, of the procedures and protocols that make up the Organisational Model or, more generally, of the internal control system, must promptly report them to the Supervisory Body, in the manner expressly indicated in the “Information Flows to the SB” Procedure, which is to be considered an integral part of the Organisation, Management and Control Model adopted by the Company. Reports may be made in paper form or electronically, and must be collected and filed by the Supervisory Body.

10.4 Amendments and updates to the Code

Any amendment and/or addition to this Code must be made in the same manner as adopted for its initial approval.

10.5 Sanctions

Compliance with the rules of the Code of Ethics must be regarded as an essential part of contractual obligations with the Company and must therefore be observed by all MARMOLES employees.

Failure to comply with the rules contained in this Code shall be subject to the sanctions provided for by law, by the applicable national collective labour agreement (CCNL) and by the Disciplinary System adopted by the Company pursuant to Legislative Decree 231/2001, where applicable.

Any conduct by collaborators in breach of the rules of this Code may, as provided for in specific contractual clauses (clause 231), also result in the immediate termination of the contractual relationship, in addition to any claim for damages.