

CODE OF ETHICS

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1. BACKGROUND

RODA was born in 1991 from great energy and visionary passion. It was driven by the entrepreneurial and commercial force of Roberto Pompa, who had a revolutionary intuition: to treat outdoor spaces as places to live and enhance, suitable for hosting finely designed furniture.

From the very beginning, RODA's mission has been about people and their connections. This is reflected in the name of the company: "RO" for Roberto and his wife Rosaria, and "DA" for their sons Daniele and Davide.

The vision is to create outdoor environments where people can feel comfortable and at ease, enjoying life's pleasures in harmony with nature, surrounded by beautiful, comfortable, and durable outdoor spaces.

Transparency, innovation, honesty, social responsibility, and environmental awareness are some of the core values and principles that RODA identifies with.

RODA's work, investments, innovation, and attention to human resources have led the company to operate in a variety of ever-evolving contexts. Therefore, it becomes essential to reaffirm and clearly define the set of values that the company embraces and intends to adopt for the entire Group.

For the purposes of this document, "Group RODA" refers to RODA Srl and its controlled companies, hereinafter referred to as "RODA" or "Group" or "Company."

The Code of Ethics serves as the fundamental framework for the moral rights and duties that define the ethical and social responsibility of every member of RODA's organizational structure.

2. PURPOSE

The present Code of Ethics (hereinafter referred to as "Code of Ethics" or simply "Code") aims to define and explicitly articulate the values and guiding principles that govern RODA's activities and relationships with all stakeholders. It serves as a primary tool for ethical conduct within the company.

3. RECIPIENTS

The principles outlined in the Code of Ethics apply to various stakeholders, including members of governing bodies, employees, temporary workers, consultants, collaborators, agents, attorneys, suppliers, subcontractors, clients, and all other individuals who come into contact with the Group or act on its behalf. These principles are binding for all mentioned parties.

Each recipient must act in a manner that best represents the company's behavior style, adhering to the principles outlined in this Code and the provisions contained therein.

4. VALUES

RODA considers the Universal Declaration of Human Rights by the United Nations and the Conventions and Recommendations issued by the International Labour Organization (ILO) as fundamental for defining its values. Additionally, the group aligns with the principles outlined in the United Nations' Global Compact and commits to contributing to the achievement of Sustainable Development Goals (SDGs).

RODA aims to promote a social, environmental, and economic framework that fosters healthy and sustainable growth, ensuring that everyone can share in its present and future benefits.

4.1 Valuing Human Resources and Respecting Diversity

RODA pursues its social purpose while fully respecting the moral and economic dignity of every individual. The company places people at the center of its reality, valuing their skills, qualities, and diversity.

Respect, equality, and merit-based recognition are fundamental values for the Group. RODA aims to create an environment that prioritizes the well-being of individuals both within the company structure and externally. To achieve this, RODA ensures a proper balance between work and private life and takes concrete initiatives to enhance cultural activities and the psychophysical well-being of its human resources. Examples of these initiatives include:

- Flexible working hours: telecommuting options and potential reduction of individual work hours based on specific needs.
- Access to an on-site gym: employees and collaborators have access to a freely usable gym facility.
- Daily provision of complimentary beverages and fresh fruit in the cafeteria.
- Social library: a collection of books focused on professional development and fiction.
- Parental support contribution: provided upon each birth.

Ensuring working conditions that respect human dignity is a cornerstone principle for the Group. RODA is committed to safeguarding the health and safety of employees, collaborators, and anyone who interacts with the companies within the Group or operates in their locations. It is a priority for RODA that work environments comply with hygiene and safety standards mandated by regulations. Regular training ensures that employees uphold fundamental health and safety principles through their behavior.

RODA condemns discriminatory or exclusionary conduct related to culture, ethnicity, age, race, gender, sexual orientation, political opinion, marital status, health, disability, or religious beliefs.

4.2 Legality

RODA promotes a culture rooted in legality and believes that compliance with national and international laws is essential.

The company respects and ensures compliance with the laws of the countries where it operates and adheres to universally accepted ethical principles in conducting business. Any illicit behavior contrary to legal norms, procedures, or the principles outlined in this Code cannot be tolerated. The Group prioritizes the establishment of a coherent system of principles, organizational procedures, controls, and management practices that make employees and collaborators aware of the ethical value of their actions. This ensures that they do not pursue personal or corporate advantages in disregard of legal norms or this Code.

4.3 Honesty, Good Faith, and Transparency

RODA bases its activities, communications, initiatives, and relationships with its employees and third parties on the principles of honesty, transparency, and good faith. The company expects its employees to act with full respect for others and these values in their interactions. Employees and collaborators of the Group must act in full respect of the principle of good faith, genuinely believing that they are acting correctly, respecting others and the rules.

4.4 Environmental Protection and Biodiveristy

RODA commits to adopting responsible and sustainable management measures for natural resources to minimize the impact of its activities on the environment, biodiversity, and the health of citizens.

In line with the principles and objectives stated in the Environmental Policy, the company has implemented a certified Environmental Management System within its production body, using environmentally friendly technologies and processes. It adopts all specific measures to prevent, contain, and reduce the environmental impact of its activities.

Materials and components used are durable, recycled, recyclable, non-toxic, hypoallergenic, and certified; the sourcing of raw materials from responsibly managed forests further expresses and emphasizes the responsibility and role assumed in ecosystem protection.

Similarly, the Group commits to transferring the values of environmental protection and biodiversity to all parties it contacts (employees, collaborators, suppliers, etc.), raising awareness and promoting responsible behavior.

5. NORMS AND PRICIPLES IN PERSONNEL MANAGEMENT

5.1 Personell Management

RODA believes that people add significant value to the company and that behavior attentive to social responsibility and environmental sustainability is an important enriching element.

For this reason, we promote proper and transparent management of “human capital” and raise staff awareness about respect and protection of the personality and dignity of each individual, in line with the identified principles of Ethical, Social, and Environmental Responsibility. The Group prevents and condemns any practice that violates human rights in general and those of workers in particular, including:

- Discrimination or marginalization;
- Child labor and forced labor;
- Harassment, abuse, threats, and coercion, whether physical, verbal, or psychological;
- Disparities in treatment.

In personnel management, open and respectful procedures and behavioral methods are adopted for “human resources,” such as:

- Legality and impartiality;
- Respect and valorization of diversity;
- Freedom of association;
- Fair remuneration and respect for working hours, including rest periods and holidays.

5.2 Selection and Career Management

The company protects and promotes the value of human resources and the wealth of individual skills. It is of fundamental interest to foster the development of each employee, ensuring that the work environment, procedures, and internal organization are constantly focused on recognizing professional potential.

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Activities of selection, hiring, classification, training, remuneration policy, and professional growth are based on criteria of impartiality, equal opportunity, equality, objectivity, competence, professionalism, and merit. In compliance with national and international laws, RODA does not employ minors nor supports the use of child labor.

The company commits to recognizing fair remuneration, also according to the provisions of the sector's National Collective Bargaining Agreement (CCNL), avoiding any form of discretion. In this perspective, the Group strives to ensure that, through analysis related to the so-called "living wage," each worker is recognized a minimum income sufficient to fully meet their basic needs. In compliance with contractual regulations and according to the principle of equal opportunities, RODA promotes professional and attitudinal training programs aimed at fostering the development of individual abilities and skills useful for the growth of both the individual and the company.

5.3 Health and safety in the Workplace

The promotion and improvement of health, safety, and psychophysical well-being conditions for employees and collaborators within the RODA Group are achieved through the creation of healthy, safe, and comfortable work environments.

RODA implements best practices for protection, risk assessment, and prevention of occupational hazards. In compliance with national and international health and safety regulations, the company scrupulously observes the obligation to inform and train its employees, requesting their constant cooperation with the appointed RSPP (Health and Safety Representative). Smoking and the consumption of alcoholic beverages, drugs, or similar substances are strictly prohibited within all Group premises, including company vehicles.

5.4 Company Assets and Resources

RODA employees and collaborators are required to use company assets and resources to which they have access or availability consciously, responsibly, and in line with internal procedures and regulations, avoiding any improper use or behavior contrary to their content.

For the performance of activities related to their role, the Company provides adequate resources and tools, including vehicles (cars, vans, etc.), laptops, smartphones, various technological accessories, online databases, management systems, and, more generally, computer tools.

5.5 Disciplinary System

Compliance with the norms and principles outlined in this Code, as well as the prevailing company rules, is an essential part of the contractual obligations of employees under Articles 2104, 2105, and 2106 of the Civil Code.

The worker, as well as anyone collaborating with the RODA Group in any capacity, must exercise the diligence required by the nature of the service, the company's interest, and the higher interest of national production.

They must also observe the provisions for the execution and discipline of work issued by the entrepreneur and by those collaborators to whom they are hierarchically subordinate.

Any violations by RODA Group personnel may constitute non-compliance with the primary obligations of the employment relationship or disciplinary misconduct, following procedures established by Article 7 of the Workers' Statute (where applicable) and provisions of the relevant National Collective Bargaining Agreements (CCNL). Legal consequences, including the

preservation of the employment relationship, may arise, and it may also be a cause for claims for damages.

The employer will adopt any disciplinary measures against the worker(s) involved in non-compliance only after prior notification of the charge and providing them with an opportunity to defend themselves.

Workers may also seek assistance from a representative of the trade union to which they belong or have granted a mandate.

For sanctioning measures, related timelines, and procedures, reference is made to the various sector-specific CCNLs.

Copies of this Code of Ethics and the company regulations are available on the company bulletin board and can also be accessed via the intranet. The Human Resources Department is responsible for its implementation.

6. NORMS AND PRINCIPLES IN RELATIONS WITH THIRD PARTIES

6.1 Customers

RODA recognizes, understands, and embraces the needs of its customers, whether private or public entities, in order to create high-quality and reliable products that meet their expectations and requirements. The Group believes that its success is closely linked to the success of its customers. Therefore, RODA operates with the goal of being a competent and reliable partner capable of providing solutions to help customers achieve their objectives.

In its interactions with customers, RODA adheres to the principles and values outlined in this Code and ensures that recipients also act in accordance with these principles, promoting fairness, transparency, efficiency, compliance with laws and regulations, and respectful, available, and courteous relationships.

Employees and collaborators are also responsible for treating customers fairly and avoiding deceptive or improper practices in their daily work activities.

6.2 Suppliers and External Consultants

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6.3 Public Institution / Public Administration

For “Public Administration” (hereinafter also referred to as “PA”), private or public entities, Italian or foreign, that perform public or public service functions, must be understood.

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RODA aligns its conduct with the principles of legality, correctness, and transparency in its relations with the Public Administration to ensure that principles of impartiality and good performance are not violated.

It is expressly forbidden, in fact, in any relationship with PA subjects, to engage in or incite others to engage in corrupt practices aimed at illegitimately influencing their decisions, with the aim of obtaining undue or illicit advantages for the Group. RODA pursues and condemns any action or behavior, by anyone, consisting of promising or offering, directly or through intermediaries, money, objects, services, benefits, or other utilities to Public Officials and/or Public Service employees, Italian or foreign, or their relatives, with the purpose of seeking or establishing personal relationships of favor, influence, or interference capable of affecting the outcome of the relationship and achieving an illicit advantage or interest for the Group.

Furthermore, recipients are not allowed to perform acts of courtesy (such as hospitality or gifts) towards PA officials that exceed the concept of “modest value” or are not considered usual based on specific circumstances. Where acts of courtesy of modest value are carried out or are due in consideration of the occasion, they must in any case be evaluated, authorized, and documented by the Group.

Recipients are also prohibited from accepting requests from a public official for money, gifts, or services to perform or refrain from performing an activity required by their role or to facilitate it. RODA has prepared specific guidelines to guide its employees and collaborators in their relations with PA and subjects performing public or public service functions. Relations with Public Institutions must be based on compliance with all legal norms, regulations, and internal procedures, respecting the image, integrity, and reputation of the Group. Therefore, relations with Local, State, Community, and International Public Institutions must be conducted solely by company functions expressly delegated or appointed for this purpose.

It is also prohibited to allocate any contributions, subsidies, or funding - even of modest value - obtained from the State or other public entities or the European Communities for purposes other than those for which they were granted.

6.4 Mass Media

External communication of information or data regarding the Group must be managed by the designated/authorized company functions and always coordinated by Roda's top management. The dissemination should only include accurate and truthful data or information that transparently reflects the Group's image. False, general, exaggerated, or undocumented information is not tolerated.

In terms of safeguarding the company's image, the management of the company's website must also be carried out in full compliance with rules, regulations, and principles of transparency and correctness.

No recipient is authorized to provide information about the Group externally without the express consent of competent parties. Roda will pursue any behavior that violates this conduct rule.

7. ACCOUNTING RECORDS AND CORPORATE COMMUNICATIONS

RODA establishes information flows from operational functions to administrative functions to ensure that administrators and shareholders are constantly updated on relevant matters.

When preparing these flows and, more generally, all accounting or corporate data and information directed at the public or the company's management, the individuals responsible are required to

adhere to the principles of transparency and truthfulness. These documents should only contain accurate data that reflects the Group's financial performance transparently. Employees responsible for preparing these documents must exercise the utmost care in verifying the data.

In addition to the principles of transparency and truthfulness, RODA requires its employees to prepare documents, records, financial statements, etc., in full compliance with laws, sector regulations, practices, and current accounting principles. Employees in specific sectors are also responsible for maintaining documentation logically, orderly, and clearly for easy reference by all relevant parties.

If recipients become aware of omissions, falsifications, or negligence in the accounting or documentation on which the accounting records are based, they must report the facts to their superior or reference person.

8. ANTI-MONEY LAUNDERING

RODA demands that its business activities comply with anti-money laundering regulations and all provisions issued by competent authorities. This requirement applies to all recipients of this document.

Therefore, all recipients of this Code are required to operate in a manner that avoids involvement in operations that could potentially facilitate money laundering. Any behavior to the contrary will be pursued and condemned.

9. CONFIDENTIALITY- PRIVACY

RODA is committed to protecting, preserving, disseminating, communicating, and handling information and data acquired during its business activities in accordance with current regulations. To this end, every appropriate measure is adopted in compliance with the current data protection regulations (EU Regulation 2016/679), including the adoption of a privacy management system that includes the development of specific policies for risk assessment and management.

Since the protection of privacy and the confidentiality of information are significant assets for Roda, each recipient must comply with the aforementioned regulations and the models and precautions adopted by the company for managing data and information that they become aware of during their work activities. Recipients must:

- Acquire and process only necessary data within the limits set by Roda's procedures, directly related to their functions and specific tasks.
- Preserve data and information in accordance with the aforementioned procedures or with explicit authorization from their supervisors.
- Communicate data and information in compliance with internal rules and procedures, maintaining strict confidentiality regarding so-called "Reserved" data and information.
- Maintain maximum confidentiality with external parties and colleagues regarding all information learned in the course of their duties, respecting company documents and know-how.

10. AWARENESS AND APPLICATION

This Code is made known to all recipients, who are committed to observing the principles contained therein. Recipients may report violations of the Code that they become aware of directly to the relevant company bodies. If behavior contrary to the principles contained in this Code of Ethics

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harms public interest or the integrity of the company, recipients may report it through the Whistleblowing channel adopted by Roda in compliance with Legislative Decree 24/2023, accessible at the following link: rodawhistleblowing.smartleaks.cloud.