

Code of conduct

VIAPPIANI PRINTING S.R.L. – Part of CTI GROUP (TRIVEST AG)

Author Catharina Trierenberg | Gudrun Pichler
Function | Company Directors
Contact catharina.trierenberg@cti.group | gudrun.pichler@cti.group
Version | Date V.2 | March 2022

**Making
brands
visible.**

www.cti.group

Index

| | |
|---|-----------|
| 1. Introduction | 4 |
| 2. General provisions | 5 |
| 2.1. Compliance with national and international laws and provisions _____ | 5 |
| 3. Corporate Social Responsibility | 5 |
| 3.1. Human Rights _____ | 5 |
| 3.2. Health & Safety _____ | 7 |
| 3.3. Environment _____ | 7 |
| 4. Business integrity | 8 |
| 4.1. Business conduct _____ | 8 |
| 4.1.1. Accounting _____ | 9 |
| 4.2. Avoidance of conflicts of interest _____ | 9 |
| 4.3. Anti-corruption and Officers _____ | 9 |
| 4.3.1. Political donations _____ | 10 |
| 4.3.2. Charitable donations _____ | 10 |
| 4.3.3. Invitations and gratuities _____ | 10 |
| 4.4. Consultants and intermediaries _____ | 11 |
| 4.5. Anti-money laundering _____ | 12 |
| 4.6. Laws relating to import / export _____ | 12 |
| 4.7. Competition _____ | 12 |
| 4.8. Counterfeiting and illicit trade practices _____ | 13 |
| 5. Data Protection | 14 |
| 5.1. Protection of personal data _____ | 14 |
| 5.2. Confidentiality and protection of business assets _____ | 14 |
| 6. General rule of conduct | 15 |
| 7. Violation of the Code of Conduct and sanctions | 15 |
| 8. Drafting, disclosure and acceptance of the Code of Conduct | 16 |

Versions index

| Version | Date | Author | Description |
|----------------|-------------|--------------------|--------------------|
| V.1 | 21/12/2021 | Board of Directors | Code of Conduct |
| | | | |
| | | | |

1. Introduction

When it comes to our business activities, we at Viappiani Printing S.r.l. (hereinafter "Viappiani") as company controlled by CTI Holding GmbH and belonging to its group companies (hereinafter, "CTI GROUP"), always endeavour to adhere to the highest possible moral and ethical principles adopted worldwide by CTI GROUP. As company belonging to the CTI GROUP, we therefore at all times comply with the statutory provisions and are also required to protect the company to the best of our ability from corruption, such as for example extortion, fraud or bribery. We commit ourselves to always perform our business activities in all areas, in particular in the area of production, purchasing, sales and employee responsibility, in accordance with the applicable laws. These principles are part of our company philosophy.

Ensuring compliance with our fundamental principles, including the applicable laws, on the part of all our stakeholders is part of our daily business. **But also the compliance with internal guidelines and rules of the CTI GROUP, when they are duly brought to the attention of the recipients, are a fundamental part of this Code of Conduct.**

This Code of Conduct defines the legal and ethical basic rules, to which Viappiani has committed itself to. By highlighting potential areas of risk and conflict and by prescribing specific guidelines of conduct for these areas, it helps all of us to act properly in cases of doubt.

This Code of Conduct applies worldwide and is mandatory for all Viappiani employees and representatives, irrespective of position, role and physical location. Strict compliance is required with the principles and basic rules contained in this Code of Conduct.

Apart from that, all business partners, including customers, representatives, consultants, and suppliers, are expected to comply with the principles and rules contained in this Code of Conduct.

Each employee of Viappiani is responsible for adhering to the rules of behaviour contained in this Code of Conduct for his area of activity and influence. In cases, where an employee of Viappiani is still in doubt, the compliance officer will be available at all times. The Viappiani Code of Conduct protects not only Viappiani and the CTI GROUP from serious consequences, but also their employees.

Each Viappiani employee is requested to immediately stop any violations of this Code of Conduct or any applicable laws becoming known to him/her, and/or to report such misconduct at the local managing director and the above mentioned responsible (compliance officer), to the extent that such communication takes place in good faith. That means that Viappiani employees must have objective reasons to believe that the information reported as well as the allegations associated with it are essentially true. The Viappiani employees who report known or suspected violations in good faith shall be protected from repressions. Any form of repression against the Viappiani employees who report violations according to these principles shall be considered a clear and serious violation of this Code of Conduct and shall be appropriately punished. Any communication, however, with the intent of falsely accusing colleagues or managers, shall not be tolerated. Such behaviour shall represent a clear and serious violation of this Code of Conduct and shall be also punished.

2. General provisions

2.1. Compliance with national and international laws and provisions

We as Viappiani always adhere to all applicable national and international laws and rules in those countries where Viappiani is active.

NOTE

- Viappiani has a Zero Tolerance Policy as far as compliance with this Code of Conduct is concerned.
- Viappiani employees are personally responsible for complying with the Code of Conduct in their area of activity and responsibility, and therefore for their actions.
- Viappiani requires its managers to ensure that their teams comply with this Code of Conduct. That includes showing a good example when it comes to compliance matters, as well as communicating the significance of this Code of Conduct to the team members on a regular basis.
- Viappiani also expects all business partners (for example customers, suppliers, sub-suppliers, consultants, resellers, agents) to comply with the rules of this Code of Conduct and reserves the right to terminate the business relationship in the case of compliance violations on the part of the business partners.

3. Corporate Social Responsibility

For Viappiani, business success is inseparably linked to social responsibility towards the Viappiani employees, business partners, the society and the environment. This includes compliance with applicable law, respecting ethical values and acting in a sustainable manner everywhere and at any time.

We are always aware of the fact that through our global business activities, we have a direct as well as an indirect influence on the society which we are working in. The support of our group companies with regard to the protection of the interests of our stakeholders (in particular society, environment, employees) is a core element of our Corporate Social Responsibility (CSR).

"An honest CSR commitment is a Win-Win-Situation for our company and our environment."

Catharina Trierenberg, Chairman of the Board

3.1. Human Rights

Viappiani operates in various countries and cultures. It is for this reason that we as Viappiani employees respect the religious and cultural diversity in respect of the applicable local laws. Requested is a tolerant, respectful and trustful behaviour, as well as open-mindedness and sensitivity, in particular when it comes to cultural, ethnic and national origin both among each other as well as towards third parties.

Viappiani commits itself to comply with and to promote the international provisions related to the protection of human rights. Viappiani treats its employees, business partners as well as the general public with dignity and respect.

All Viappiani employees are to be deployed for the benefit of the company according to their skills, expertise and experiences. Each of us is required to make a positive contribution towards a comfortable, respectful and

constructive working environment.

Viappiani adheres to the following principles in particular:

- **Ban on child labour:** No child labour is allowed in Viappiani, specifically during the entire manufacturing process. This ban on child labour also applies to any business partners, who do any work of any kind for Viappiani.
- **Working hours:** The working hours in Viappiani always comply with the local laws.
- **Remuneration:** Wages and salaries are to comply with the local laws.
- **Human dignity:** Any form of inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, physical or psychological compulsion of the Viappiani employees is prohibited.
- **Ban on discrimination:** Any discrimination of Viappiani employees is generally prohibited. In particular, any form of discrimination based on ethnic and cultural origin, nationality, gender, race, age, disability, faith or sexual orientation is prohibited. We expect the Viappiani employees to give equal opportunities in recruiting, remuneration, promotion, further training, etc.
- **Freedom of assembly:** Viappiani respects its employees' freedom of assembly and their right to collective bargaining in accordance with local legislation and practice.
- **Open and free communication:** An open and direct communication between the Viappiani employees and the management is the most effective way of problem-solving, in particular when it comes to workplace and/or remuneration. Each employee of Viappiani is entitled to communicate his/her concerns regarding working conditions etc. openly with the management, without having to worry about any disadvantages, intimidation or harassment as a result thereof.
- **Workplace:** Viappiani ensures that its employees have a safe and professional workplace, where teamwork, cultural diversity and trust are practised and encouraged.
- **Personal development:** Viappiani strives to support each and every employee in his/her personal professional development based on the employee's particular skills.

NOTE

Ethical behaviour is a basic principle of Viappiani. Viappiani respects, protects and promotes the applicable rules for the protection of human rights as fundamental and generally applicable guidelines. This behaviour applies to all business partners of Viappiani, both within as well as outside Viappiani.

3.2. Health & Safety

Constant improvement in employee safety and health is a central part of our high quality work procedures. Our goal is to achieve an accident-free working environment for our employees. We commit ourselves to comply with all relevant laws and directives related to Health & Safety.

Management is responsible for the compliance with health and safety guidelines. It sets corresponding goals, makes available the necessary resources, and implements further measures to achieve these goals.

These objectives are in particular achieved by means of:

- **Constant improvement and preventative measures:** Potential accidents shall be recognised; occupational hazards avoided and causes of accidents removed by means of risk analyses. The working environment as well as the working methods shall be evaluated and improved on a regular basis, including in terms of safety.
- **Information and training of employees:** All Viappiani employees shall be provided with the necessary information regarding health and safety risks, including protection and preventive measures. Management has to ensure that Viappiani employees get appropriate health and safety training.
- **Responsibility:** Managers are responsible for health and safety in their departments. Each [Viappiani employee](#) is responsible towards himself/herself as well as towards other employees. Strict adherence to safety instructions by the subjects to whom Viappiani has delegated the fulfilment of the obligations relating to Health and Safety in the workplace is expected and mandatory, as well as a proactive information on possible Health & Safety risks. The respective locally applicable statutory provisions are to be complied with as a minimum requirement.

NOTE

What Viappiani expects from its employees:

- Note that health and safety affects not only you, but always your colleagues as well.
- Continuously improve safety at the workplace and take care of your health.

3.3. Environment

Safeguarding the environment is an integral part of Viappiani's mission. Viappiani undertakes to conduct all its activities in compliance with environmental sustainability, acting through concrete choices, based on the following guiding principles:

- direct commitment to a constant reduction of the impact of production activities;
- design of increasingly sustainable products;
- attention to the needs of all stakeholders and local communities in the countries hosting Viappiani's activities;
- preparation to seize the stimuli of customers who make environmental sustainability their development strategy;
- preference for suppliers that demonstrate the best performance in terms of environmental sustainability.

Viappiani undertakes to comply with all regulations relating to environmental protection. Employees are required to continuously support Viappiani in achieving the objectives defined as part of the environmental strategy which is based on the following pillars:

- Products (reduce the environmental impact of products as much as possible);
- Standards (to respect and, if possible, exceed standards and laws on "environmental" matters);

- Waste (reduce the quantity of raw materials used for products);
- Recycling (use recycled/recyclable materials in products whenever possible);
- Awareness (educating employees to reduce waste production and excessive use of resources);
- Research (developing new products in line with the principles of environmental responsibility);
- Structures (define and maintain programs to design and manage structures respecting and, where possible, exceeding the standards defined by laws and regulations);
- Decision-making criteria (considering environmental issues in all the main business operations of the company);
- Responsibility for the past (acting responsibly to remedy any negative environmental impacts of past business practices).

NOTE

What Viappiani expects from its employees:

- In the daily work, be careful how you work with resources of the company, including energy.
- Carefully consider the possible effects on the environment when making business decisions.
- Do your part when it comes to closing of the loop in terms of material cycles (recycling of materials, etc.).
- Help to continuously reduce impact of energy and other resources in production.
- Contribute your part to the gradual reduction of effects on the environment through the reduction of waste and emissions into the air, soil and water (implementation of energy efficiency programmes in plants, waste reduction programmes as well as reduction of water consumption).

4. Business integrity

4.1. Business conduct

As a reliable, trustworthy and innovative partner we treat all our business partners with honesty, fairness and in accordance with the respective applicable laws. The way that we do things at Viappiani is characterised by our values listed below. **We, as Viappiani and as members of the CTI GROUP, must therefore always be conscious of these values and behave accordingly both internally as well as externally. Our behaviour can have a direct influence on the image and reputation of Viappiani and of the CTI GROUP.** All Viappiani employees are required to contribute towards the well-being of the company. The company trusts that all Viappiani employees make their decisions exclusively on the basis of factual criteria and are not influenced by personal interests and relationships.

Our values - associated with the principles stipulated in the Code of Conduct - are:

- Responsibility
- Reliability
- Respect
- Honesty
- Teamwork
- Passion
- Long-term Sustainability

We take responsibility and meet the requirements that we set ourselves. We make our best contribution, we do what we say and commit, others can rely on us.

Respect and honesty are the pillars of our cooperation as a team. We treat others with the same appreciation

with which we would like to be treated. We appreciate people beyond their assigned roles.

We act with passion, joy and with altruism. What we do, we do completely.

We use our resources responsibly and strive for sustainable solutions.

We communicate our values both internally as well as externally towards our business partners, so laying the foundation for an outstanding and profitable cooperation.

4.1.1. Accounting

Viappiani maintains a finance and accounting system, which provides a comprehensive and appropriate representation of its overall business transactions and complies with the applicable national and international accounting guidelines.

4.2. Avoidance of conflicts of interest

All Viappiani employees are required, as far as possible, to avoid situations in which private interests are or may be in conflict with the interests of Viappiani. Should an Viappiani employee become aware of the possibility of an existing or potential conflict of this sort, he/she immediately has to inform the compliance officer and request support.

The mere existence of private interests in a business-related situation does not necessarily have to lead to a conflict of interest. Most cases can be resolved by clearly documenting the private interests and indicating in a transparent manner why there is no conflict in fact.

In any case, we are all required to make all relevant decisions to the best of our knowledge and belief as well as in the interest of Viappiani.

4.3. Anti-corruption and Officers

Most countries have laws to combat bribery and corruption. Each employee of Viappiani is required to comply strictly with these laws and the corresponding internal guidelines. Viappiani follows a strategy of zero-tolerance towards bribery and corruption.

NOTE

The acceptance and granting of bribes and facilitation payments– directly or indirectly – is strictly prohibited for all business transactions that Viappiani is involved in.

The compliance officer should be informed immediately in all cases of suspected corruption.

Offering, giving, or receiving a gift with the intention or the effect of influencing the decision-making process of a business partner or a public officer is strictly prohibited and punishable.

This in principle also applies to so-called facilitation payments, speed or grease money, by which the payer tries to secure or speed up a routine service, that the payer is entitled to (in contrast to bribe). The Viappiani employees may not be involved in any such facilitation payments. If you are confronted with facilitation payments, you must immediately inform the compliance officer.

The good-faith offering, giving or receiving of reasonable gifts, hospitality or other gratuities is on the other hand expected in many situations, based on local customs, traditions and moral values. These benefits are often needed to build or maintain business relationships. If the refusal to offer or accept a benefit results in a loss of the business relationship, the benefit may be offered or accepted under the following prerequisite cumulative

conditions:

- The provision or acceptance of the benefit is appropriate and legally permissible.
- The provision or acceptance of the benefit is correctly and sufficiently disclosed.
- The provision or acceptance of the benefit is comprehensively and precisely documented and has been approved in writing by the local management.
- In case of doubts contact the compliance officer.

4.3.1. Political donations

Viappiani (or its employees on behalf of the company) are not allowed to make any political donations. In individual cases the top management of Viappiani may approve exceptions.

4.3.2. Charitable donations

Viappiani supports local and charitable projects, subject to the condition that such gratuities are in fact legally permissible and approved by top management of Viappiani.

4.3.3. Invitations and gratuities

All Viappiani employees have to ensure that in case of the granting or accepting of a gratuity (for example a present, an invitation, etc.) they do not give the impression or trigger the thoughts that they have acted with improper or evil intention.

The following rules are to be complied with at all times:

- The nature, value and frequency of gratuities must be appropriate to the occasion in which they are made, as well as to the position and relationships of the recipient.
- The gratuity must be permitted by local laws and regulations. In case of doubt, a gratuity may not exceed whatever an employee of Viappiani may accept according to the currently applicable worldwide laws and internal guidelines.
- The gratuity may not be given or accepted for the purpose of influencing a decision of the recipient or to obtain an unduly benefit in return.
- The gratuity must be properly documented (for example for auditing purposes) by entering it into the records designated for this purpose.
- Irrespective of the amount, monetary gratuity (cash) or corresponding considerations (cheques, and so forth) are strictly prohibited.
- The offering and giving of gratuity to public officers or the receiving of gratuity from public officers are subject to especially strict rules.

In other words: the offering, giving or receiving of gratuities can be permitted if the gratuity is transparent, modest, appropriate, commensurate to the situation and legal according to local laws and is not given with the intention of maintaining or getting a business or to secure a benefit, which may be qualified as bribery and therefore is strictly prohibited.

NOTE**What Viappiani expects from its employees:**

- Avoidance of situations with possible conflicts of interest.
- All actual or potential conflicts of interest are to be communicated immediately to the direct supervisor.

What Viappiani employees may NOT do:

- Accepting private benefits from business partners of Viappiani.
- Use employees or property of Viappiani for private purposes.
- Abusing the own position at Viappiani in bad faith for a personal benefit or for the benefit of relatives or friends.
- Conducting private activities outside of Viappiani with a negative impact on one's work performance for Viappiani due to the use of resources that should instead be allocated to carrying out one's work for Viappiani.
- Work for a competitor of Viappiani or a have a link with a competitor which would harm the interests of Viappiani.

4.4. Consultants and intermediaries

In some countries, when initiating or developing business relationships, Viappiani involves external consultants and distribution partners, who engage in sales-supporting activities in the interest of, or based on the instruction of, Viappiani or its customers.

Because of the lack of affiliation to Viappiani or to the CTI GROUP, it is not always certain that these consultants and distribution partners adhere to the high level of ethical principles of conduct of Viappiani. In order to mitigate as far as possible the risk that the compensation paid to them by Viappiani is then used as a means of corruption, consultants are to be used with the utmost caution. Compensation to consultants and distribution partners may only be paid for consulting and other services actually provided in accordance with the relevant contracts and the compensation must be adequate to the services provided.

Statutory violations by such consultants and service providers may damage the reputation of Viappiani and the CTI GROUP and even lead to a liability of the company towards third parties as well as very high financial penalties.

NOTE

- Carefully verify the integrity of potential consultants and intermediaries before giving them an instruction and before executing payments, in accordance with the "Know-Your-Customer-Policy" as reported under point 4.8.
- Make sure that the contracts that you are responsible for are able to withstand legal and financial scrutiny also in comparison to contracts with other intermediaries.
- It is not allowed to circumvent the rules of this Code of Conduct and the prohibitions or restrictions included herein through the use of third parties such as agents, representatives, consultants, subcontractors, etc.

4.5. Anti-money laundering

Viappiani carries out its business in full compliance with the anti-money laundering regulations in force and the provisions issued by the competent Authorities.

To this end, Viappiani undertakes not to carry out suspicious transactions in terms of correctness and transparency and to check in advance the information available relating to customers, suppliers, commercial partners, external collaborators and agents, in order to verify their respectability and the legitimacy of their activity. All Viappiani employees also undertake to operate in such a way as to avoid the involvement of Viappiani in operations, even potentially suitable for favouring the laundering of money deriving from illegal or criminal activities. Each employee who carries out, on behalf of Viappiani, operations and/or transactions involving sums of money, goods or other economically valuable benefits must be authorized and provide any valid evidence for its verification upon request.

Collections and payments must be strictly made through bank remittances and/or bank checks issued with the non-transferability clause. There is also an obligation for all employees to:

- not to accept goods and/or services and/or other benefits for which there is no suitably authorized order/contract;
- not to make cash payments exceeding Euro 1,000 (for this purpose, payments made in several instalments of a smaller amount but relating to the same supply and overall greater than Euro 1,000 are also relevant) or the different amounts established from time to time by law as maximum limit for cash payments.

4.6. Laws relating to import / export

Viappiani undertakes to comply with the rules that regulate the import/export activity, including the temporary restrictions from time to time decided by the Italian State, by the foreign States in which the companies of the CTI GROUP are based and by the supranational organizations which the Italian State adheres (EU, NATO, UN, etc.).

4.7. Competition

As a highly innovative developer and manufacturer of product decorations, Viappiani is convinced of the significance of functioning markets as well as competition as driving forces for innovation, technical progress and constant quality improvements. The violation of applicable antitrust and competition law can result in very serious damage for Viappiani and the CTI GROUP. The Viappiani employees are strictly prohibited from concluding agreements or agreeing to certain behaviour which aim to, or result in, a prevention or restriction of competition.

It must be ensured that in the communication and correspondence with competitors no information is exchanged which allow conclusions regarding current or future market behaviour on the part of Viappiani or its competitors. In principle, the Viappiani employees will have contact with competitors only to the extent that such contact is absolutely required on legally permissible commercial grounds. To the extent that Viappiani has a leading/dominant market position, Viappiani will take whatever measures may be required in order to prevent the abuse of this market position. In particular, Viappiani will not discriminate against any customers or unfairly hinder competitors.

In terms of all business processes, the Viappiani employees are to comply with the internal guidelines for correct behaviour in terms of competition and in all cases of doubt, turn to the Compliance Officer in a timely manner.

NOTE**Principles:**

- The Viappiani employees must comply with the applicable antitrust and competition law guidelines.
- The Viappiani employees must handle with particular caution any relevant or critical information concerning competition.
- The Viappiani employees must immediately inform the management regarding attempts by competitors to exchange competition-relevant information or to agree on anticompetitive behaviours.

The following is in particular prohibited:

- Fixing prices or other conditions with competitors.
- Exchanging information with competitors which is market relevant, such as prices, rebates, production capacities, areas, customer groups, etc..
- Distribute markets with competitors (for example, with regards to areas, products, customers and suppliers).

4.8. Counterfeiting and illicit trade practices

Viappiani conducts its business according to ethical and legal principles. In particular, when it comes to the prevention and elimination of product and distinctive signs counterfeiting, Viappiani is committed to make sure that it develops business relationships only with reputable companies and individual persons. Therefore:

- Viappiani does not counterfeit any products.
- Viappiani verifies, before each business transaction, whether or not the possible business partners are or were involved in counterfeiting or illicit trade activities.
- Business relationships entered into with (potential) customers, who have demonstrably participated in illegal activities, are immediately terminated or not entered into in the first place.
- Viappiani has developed a so-called "Know Your Customer" policy, in particular for the purpose, as far as possible, of verifying new customers as far as their integrity is concerned.
- Any cases of counterfeiting and illegal commercial practices are in any case managed by the management of the CTI GROUP which is also the direct contact person of the customers with regard to these matters.

NOTE**In terms of the "Know Your Customer" approach, the following points are to be considered:**

- In the case of new design entrustment, the right of use of the customer (such as copyright, trademark protection, registered design protection) must be verified and, if necessary, confirmed in writing by the customer (including through a warranty representation).
- Verification of the customer (for example by means of requests made to the local foreign trade authority, local attorney, register excerpts, trade association, etc.), whether the recipient customer is an existing company that is properly entered into the respective register (company register, commercial register etc.), including its shareholding.
- Periodic verification of the company and ownership structure (at least 1x per year) of the recipient customers.
- Verification of the ratio of the ordered/delivered quantity of the product to the quantity that the recipient customer needs in terms of his official business (customary in the industry).
- No deliveries to customers who are suspected of illegal use/forwarding of product(s) already delivered at an

earlier point in time, to the extent that this suspicion cannot be eliminated demonstrably and without any doubt.

- No deliveries to customers who were or may have been involved in illegal business such as product counterfeiting, illicit trade etc., to the extent that this suspicion cannot be eliminated demonstrably and without any doubt.
- Best possible assurance that the deliveries were made to the ordering customer, or the freight forwarder commissioned by the customer.
- No payments are to be accepted for deliveries, which do not come from customers (or a third party explicitly designated by them), who were invoiced for the delivery.

5. Data Protection

The majority of the business information of Viappiani and of CTI GROUP is confidential or legally protected. Therefore, there is an obligation of secrecy. This does not apply if the Viappiani or CTI GROUP's top management approved a disclosure of the information or if a disclosure is compulsory based on laws or regulations.

Viappiani has implemented binding internal guidelines for data protection and IT security. Viappiani employees are encouraged to contact the local data protection officer in cases of doubt.

5.1. Protection of personal data

Viappiani explicitly commits itself to the protection of personal data of both Viappiani and CTI GROUP employees as well as all business partners. Viappiani collects, stores, processes or uses personal data exclusively for legitimate business and, to the extent legally required, administrative purposes (for example human resources, etc.). All personal information about Viappiani and CTI GROUP employees, customers, business partners and suppliers as well as other third parties are to be carefully used by Viappiani and treated confidentially. This is done in full compliance with the respective data protection laws. The protection of this information must be handled with the greatest care.

5.2. Confidentiality and protection of business assets

The obligation of secrecy refers in particular also to the intellectual property of Viappiani and the CTI GROUP. This includes business secrets, patents, brands and copyright, but also business and marketing plans, designs, business documentation, salary details and all other non-disclosed, financial data and reports. The unauthorised forwarding of technical know-how, trade and business secrets of Viappiani and the CTI GROUP or third parties can have serious consequences for the company and the relevant Viappiani and CTI GROUP employees.

Material and immaterial business assets (for example products of Viappiani and CTI GROUP, work equipment, software licensed to Viappiani and to CTI GROUP, etc.) may only be used for business purposes. Viappiani employees therefore treat such information as confidential and with greatest care. Viappiani employees are furthermore obliged to ensure that the business assets are not damaged, misused or wasted.

NOTE

Principles:

- The applicable data protection laws as well as the corporate guidelines regarding the protection of data and IT security are to be complied with.
- Treat personal data with care and collect, store, process or use this data only on a legal basis or with the consent of the relevant data owner.

You are prohibited from:

- intentionally damaging the property of Viappiani and/or the CTI GROUP, waste or divert it from its intended use, or use it for non-business purposes.
- sharing confidential business information of Viappiani and/or the CTI GROUP (for example technical know-how, operational and financial data, customer information, etc.) or personal data of colleagues or business partners with third parties without authorization.

6. General rule of conduct

In terms of a rule-of-thumb, each employee of Viappiani shall ask the following control questions in cases of doubt:

- Does my behaviour represent the company values of Viappiani?
- Is my behaviour free from any conflicts of interest?
- Is my behaviour legal and is it aligned with the group guidelines of Viappiani?
- Would I feel good about it if my actions were seen online or on television? Or if I read about it in the newspaper?
- Would I feel good about it if I had to explain my actions to my supervisor?
- Would I feel good about it if I explained my actions to one of my family members?

IF THE ANSWER TO ANY ONE OF THESE QUESTIONS IS "NO", THE PLANNED ACTION MAY NOT BE EXECUTED!

Should you have any doubt with regards to these questions, please contact:

- Your supervisor and/or
- Gudrun Pichler (+43 664 88304601 / gudrun.pichler@cti.group) and/or
- Catharina Trierenberg (+43 7229 24200 5001 / catharina.trierenberg@cti.group)

7. Violation of the Code of Conduct and sanctions

As regards compliance with this Code of Conduct, Viappiani pursues a zero tolerance policy.

Compliance with the provisions of this Code of Conduct constitutes an integral part of the contractual obligations assumed by Viappiani employees and by customers, suppliers, consultants, collaborators in various capacities, commercial and financial partners and other subjects having relationships with Viappiani.

Their violation by Viappiani employees constitutes a disciplinary offense punishable in compliance with the applicable laws (such measures can range from warnings/admonitions to dismissal). Viappiani, through the bodies and functions specifically appointed for this purpose, ascertains the infringements by the employees and

imposes, with coherence, impartiality and uniformity, sanctions proportionate to the violations and in compliance with the current provisions on the regulation of employment relationships.

If the violation is committed by third parties required to comply with this Code of Conduct by virtue of specific clauses included in the related contracts, this entails the sanctions consisting of a warning to comply, the application of a penalty and/or the compensation for damages and/or the termination of the contract.

Viappiani undertakes to inform customers, suppliers, consultants, collaborators in various capacities, commercial and financial partners and other subjects having relations with the company about the content of this Code of Conduct. When signing the contract, these subjects must declare that they know the principles set out therein, committing themselves to respect them, in the context of the activities they carry out on behalf of Viappiani, and not to behave in a way that could induce Viappiani, through its managers and employees, to violate the rules of the Code of Conduct.

8. Drafting, disclosure and acceptance of the Code of Conduct

This Code of Conduct has been drawn up by the Board of Directors of Viappiani in compliance with the directives issued by the CTI GROUP. The Board of Directors of Viappiani also provides for any changes and additions to the same.

Viappiani discloses this Code of Conduct as widely as possible, publishing it on its website at www.viappiani.it, on the company intranet and delivering a copy thereof to each employee. Viappiani, upon entering into an employment contract, delivers, and has the new employee sign, a copy of the Code of Conduct.

This Code of Conduct is also distributed to the recipients other than Viappiani employees (e.g., consultants, suppliers, customers, etc.) according to the procedures from time to time deemed most suitable for an effective disclosure, including attachment to the related contracts.

With regard to subjects other than Viappiani employees, the acceptance of this Code of Conduct may take place, in addition to the express signing of the same by the recipients, in the manner provided from time to time for the stipulation of contracts with these subjects.