



THE CODE OF ETHICS AND CONDUCT OF THE GT LINE GROUP

Edition 3 of 07/05/2025



Dear all,

it is with great pride that I introduce this new, updated version of our GT Line Group Code of Ethics and Conduct.

I am convinced that reading this can be of great interest to all of you, as it recalls the values that have always inspired us and that remain fundamental in our continuous search for innovative solutions for the sustainable development of the GT Line Group.

With a renewed spirit, with you all I continue to apply the lessons of a father and entrepreneur, Giampaolo Tonelli, who over half a century ago had the courage to start this business, making his dream come true. I do this with a strong sense of responsibility and the awareness that to maintain its success, every company must renew its efforts to succeed day by day, especially in the most difficult times. We all know that success can be fleeting, but that which remains, indelibly carved in stone, is the integrity with which we pursue it.

Integrity means doing the right thing in every situation, whether we are being watched or not; it means having the courage to act responsibly, regardless of the consequences.

Building a reputation for integrity takes years, but it's never enough - it takes just a moment to shatter it. Therefore, we must never allow ourselves to make decisions that can compromise our integrity and, consequently, the reputation of the GT Line Group.

The trust others place in us is invaluable, and will be reflected in the success of our work, spreading rapidly, even beyond the Company itself, to our people.

So we therefore do the right thing, and everything else will follow; we act with resilience in the face of adversity, we stand by the strength and courage of our values and our principles, because these are the essential foundations of the path which began with my father.

Massimo Tonelli



Table 1 - Summary of document editions

Edition	Approved by	Date	Notes
1.0	Board of Directors	30/04/2014	<i>First issue</i>
2.0	Board of Directors	02/02/2018	<i>Comprehensive review</i> Organisational changes Legislative changes [last provision: Law no. 167/2017]
3.0	Board of Directors	07/05/2025	<i>Comprehensive review</i> Legislative Decree no. 24/2023 Whistleblowing Organisational changes Legislative changes [last provision: Legislative Decree no. 141/2024]

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Introduction

Founded in 1970 in Bologna, GT Line Srl has been designing and manufacturing a unique range of technical cases and boxes for over 50 years: GT LINE-branded tool cases, renowned worldwide as the most reliable professional tool containers; the wide range of practical and lightweight WORK LINE by GT solutions for professional tool users; @HAND containers for mobile computing and, last but not least, the EXPLORER CASES range of watertight containers, made of polypropylene copolymer, which guarantees maximum protection for the transportation of professional equipment. The company has been a world market leader for some time, thanks to continuous investments in research, development and innovation leading to several patents covering our practical and efficient solutions.

With three production sites located strategically around the world, the company GT Line Srl and the GT Line Group (hereinafter, also "the Company", "the Group" or, indistinctly, "GTL") supplies solutions and products for solving all professional equipment transportation needs, whether for humanitarian missions, engineers on oil platforms or hikers in the Himalayas.

All the production and assembly processes of our products are highly automated, to guarantee maximum reliability, strength and constant quality. GT Line Srl is certified in accordance with the Quality System standard UNI EN ISO 9001:2015, and thus works to constantly improve the products and solutions it supplies to customers located in the most remote corners of the planet every day.

GTL has always performed its activities and conducted its business in full compliance with the laws and regulations in force in the legal systems of all the countries in which it has operated and continues to operate. This respect is made possible by the effective and concrete engagement of all the people who, directly or indirectly, work every day in the name, on behalf or in the interests of the Group companies.

In this context, GTL has deemed it appropriate to produce and adopt this *Code of Ethics and Conduct*, in order to clearly define the set of values that the Company and the Group have always recognised, accepted and promoted in the conduct of its business and in the management of relations with every third party.

The Code of Ethics and Conduct sets out the fundamental values and rules that must inspire the behaviour of all those who have relations with the Group, including full compliance with such values and rules; these are the essential conditions for the success of the company and for the improvement of the social context in which it operates.

GTL considers it essential to create the conditions for promoting a work environment inspired by respect, fairness and cooperation, and which also lead to the engagement and empowerment of all employees and collaborators, in relation to the specific objectives to

be achieved and the methods to pursue them. Therefore, it ensures the accurate dissemination of information on the principles set out in the Code of Ethics and Conduct and on their application to all the persons to which it refers, so that all those who work - in any capacity - for GTL, constantly carry out their activity, assignment or function in strict compliance with the principles and values contained therein.

All Persons who work or collaborate with the GT Line Group companies, with no distinction or exception, undertake to comply with and enforce the principles of the Code of Ethics and Conduct within the scope of their functions and responsibilities.

In particular, these principles are specifically addressed to the following Recipients:

- (i) the members of the Administrative Bodies and of the Control Bodies of the companies belonging to the GT Line Group, respectively in the implementation of corporate actions in line with the determinations adopted and in the control and verification of the formal correctness and substantial legitimacy of the company's activities, the operation of the internal control system and risk management;
- (ii) all workers (managers, employees and collaborators) employed by, or holding any form of collaboration with, the GT Line Group, also on an occasional or temporary basis, wither for consideration or free of charge;
- (iii) all Third Parties that initiate or maintain relationships of an industrial, commercial, financial or professional nature with GTL, both for consideration and free of charge.

Without prejudice to the responsibility for the implementation and verification of the provisions set out in this document by GT Line Srl, through the implementation of adequate prevention and control tools, all Recipients are required to ensure both compliance with this Code of Ethics and Conduct, and report any non-compliance or violations.

As "leaders" of their teams, senior and middle managers within the GTL organisation are responsible for practically applying the values of the Code of Ethics and Conduct, through their behaviour promoting the awareness that acting according to the principles of the Code of Ethics and Conduct is an essential element of GTL's business style.

UNDER NO CIRCUMSTANCES SHALL THE ALLEGED BELIEF OF ACTING TO THE ADVANTAGE OF GTL COMPANIES JUSTIFY THE ADOPTION OF BEHAVIOURS CONTRARY TO THE PRINCIPLES SET OUT IN THE CODE OF ETHICS AND CONDUCT.

This document aims to identify and define the aforementioned principles and disseminate knowledge and awareness among all economic operators and stakeholders with whom GTL interacts in order to effectively apply them.

GT Line Srl and Legislative Decree no. 231 of 8 June 2001

On 8 June 2001, the Italian legislator issued Legislative Decree no. 231 governing the "*administrative liability of legal persons, companies and associations, even without legal personality*". This Decree introduced into Italian law the principle of the responsibility of these entities for offences committed, in their own interest or for their benefit, by employees and/or by other persons (e.g., directors, statutory auditors, managers, representatives of the company, as well as other persons subject to their direction or supervision), unless, among other conditions, the company has adopted and effectively implemented a suitable organisation and management model for the prevention of these offences.

Consistently with its business growth and the desire to align its management to the latest corporate governance rules, GT Line Srl considers it essential to adopt its own organisation and management model ["*Model 231*"] in accordance with the requirements of Art. 6 of the Decree. In this way, the company's top management has demonstrated that the adoption of such an organisational model is a further way of promoting appropriate levels of correctness and ethics in its actions, confirming the path of integrity and transparency that has always characterised GTL's conduct to third parties and the market.

THE CODE OF ETHICS AND CONDUCT IS AN INTEGRAL PART OF THE MODEL 231 ADOPTED BY GTL AND REPRESENTS THE HIGHEST SELF-REGULATORY REFERENCE IDENTIFIED IN ITS INTERNAL REGULATORY SYSTEM.

This Code of Ethics and Conduct is adopted by resolution of the Administrative Body of 07/05/2025. Any changes, additions and updates are approved by resolution of the Administrative Body, also having sought the opinion of the Supervisory Body.

Scope of application

The Code of Ethics and Conduct applies to all entities belonging to the GT Line Group and to the Recipients, as identified above, wherever the activity is carried out and whatever the level of the organisation involved, while considering any possible cultural, social and economic differences.

In the event of misalignment between the principles expressed in the Code of Ethics and Conduct and local regulations, the most restrictive provisions shall apply, whether those set out in the Code of Ethics and Conduct or in the specific individual legal system on a case-by-case basis.

Binding application

With regard to the Recipients linked to the GT Line Group by an employment relationship, compliance with the requirements set out in this Code must, in particular, be considered an essential part of the contractual obligations pursuant to and for the purposes of the

provisions of art. 2104 et seq. of the Italian Civil Code (diligence of the employer) or any other specific labour law legislation of the country of reference.

With regard to any other third party recipient, compliance with the requirements set out in this Code is an essential prerequisite for establishing and/or continuing the professional/cooperation relationship with GTL and must, in particular, be considered an essential part of the contractual obligations undersigned in the industrial, commercial or professional relationship established.

Compliance with the principles defined in this Code of Ethics and Conduct is subject to verification by the *Supervisory Body* ["SB"] of GT Line Srl, established pursuant to Legislative Decree 231/01 and sanctions shall apply to any Recipients who do not comply with them.

Dissemination and training

GTL undertakes to disseminate the values and behavioural principles set out in this Code of Ethics and Conduct to ensure that they are applied to everyday choices and promote the awareness of and ability to recognise, analyse and solve recurring ethical aspects at the organisational level.

In order to ensure the correct adoption and implementation of the principles of conduct set out in this document, the Code of Ethics and Conduct is made available to the Recipients, in particular through:

- a) communication and dissemination to all members of the administrative and control bodies of the GT Line Group companies and to all employees;
- b) the posting of the Code in the company, in places accessible to all;
- c) the provision to Third Party Recipients and any other interlocutor by sending a copy and/or through the company website.

GTL requires all employees, external collaborators, partners and suppliers to certify that they are familiar with the Code of Ethics and Conduct and undertake to comply with the provisions contained therein.

In contracts with Third Party Recipients, the adoption of clauses and/or signing of statements aimed at both formalising the commitment to comply with the Code of Ethics and Conduct, and regulating contractual sanctions, in the event of a violation of this undertaking, is envisaged for this purpose.

The SB promotes training initiatives aimed at assuring a clear understanding of the contents of the Code of Ethics and Conduct.

Reporting of violations of the principles of the Code of Ethics and Conduct

Conduct that is contrary to the principles and rules of conduct provided for by the Code of Ethics and Conduct adopted by GTL, in the broadest public interest or the integrity of GT Line Srl its administration, may be reported.

To this end, GTL has activated - also in accordance with the provisions of Legislative Decree no. 24/2023 - a channel dedicated to the reporting of any offences or, in any case, irregular conduct. This channel is active on an independent web platform, outside of GTL's corporate domain, to guarantee the confidentiality and protection of the whistleblowers and any other person to whom the reports refer.

This platform can be found at:

[HTTPS://GTLINE.WHISTLELINK.COM](https://gtline.whistlelink.com)

On the platform, it is possible to consult the information issued to the data subjects, pursuant to Articles 13 and 14 of Regulation EU/2016/679 on the protection of personal data as well as the methods of handling reports, as governed by the dedicated *Reporting Management Policy*, issued by GT Line Srl and addressed to all Group companies subject to Directive (EU) 2019/1937 of the European Parliament and of the Council, also available on:

[HTTPS://WWW.GTLINE.COM/IT/AZIENDA/GOVERNANCE/GT_LINE_CODICE_ETICO__WHISTLEBLOWING/](https://www.gtline.com/it/azienda/governance/gt_line_codice_etico__whistleblowing/)

Whistleblowing reports are managed - by virtue of the professionalism, autonomy and independence that characterises its role - by the Supervisory Body of the parent company GT Line Srl, appointed pursuant to Art. 6 of Legislative Decree no. 231/2001.

Whistleblowers and persons close to them are protected by strict internal provisions and by the same provisions referred to in Legislative Decree no. 24/2023, against all forms of - direct or indirect - retaliation as a result or for reasons related to the report. Any violation of the obligations of confidentiality and protection of the whistleblowers will be prosecuted pursuant to the Disciplinary System adopted by GTL.

For more details, please refer to the above-mentioned Whistleblowing Management Policy.

Sanctions system

The violation of the provisions set out in the Code of Ethics and Conduct damages the relationship of trust established with GTL and may lead to the application of disciplinary actions, the revocation of powers and functions, the referral to the competent Authorities or the request for compensation for damages, without prejudice, for employees, to

compliance with the provisions set out in the Workers' Statute and in the collective labour agreements and/or in the specific labour laws of the other reference countries.

In particular, due to the foregoing, the violation of one of the provisions of the Code of Ethics and Conduct - including violations of the confidentiality of whistleblowing reports - also represents a violation of Model 231 and, as such, constitutes a disciplinary or contractual offence that may involve:

- (i) for Recipients linked to the organisation of GTL by an employment relationship, the application of gradual sanctions commensurate with the severity of the violation, in compliance with current labour legislation;
- (ii) for any other third party Recipient, the dispute of the conduct, the application of penalties and compensation for damages. In the most serious cases, the immediate termination, also pursuant to and for the purposes of Art. 1456 of the Italian Civil Code, of any existing contractual relationship, without prejudice to the possibility of any further claim for compensation for damages.

The rules governing the application of the sanctions system are identified within the Disciplinary System, an integral part of Model 231 adopted by GT Line Srl, to which reference should be made.

The disciplinary system of the GT Line Srl can be found at <https://www.gtline.com/governance>

1 Ethical principles

GT Line Srl has, in this Code of Ethics and Conduct, defined the ethical principles and rules of conduct to which it is inspired in the conduct of its business.

FAILURE TO COMPLY WITH ETHICAL PRINCIPLES AND RULES OF CONDUCT SHALL MAKE IT IMPOSSIBLE TO ESTABLISH OR CONTINUE ANY INDUSTRIAL, COMMERCIAL AND PROFESSIONAL RELATIONS WITH THE GTL ORGANISATION

1.1 Integrity

The basis for the establishment of any employment, collaboration and – more generally – business relationship with any third party, internal or external to its organisation, are the assessments regarding the following principles:

- correctness,
- transparency and traceability,
- honesty and respect for the law,
- loyalty,
- responsibility,
- good faith.

Correctness

This principle implies the commitment, on the part of all the Recipients, in the performance of their functions, to respect the rights of each person involved in their work and professional activity.

The Recipients have the obligation to act correctly in order to avoid situations of conflict of interest, or all situations in which the pursuit of their interest is contrary to the interests and purposes of the other party.

Any situation through which a Recipient can obtain an advantage and/or an undue profit from known opportunities during and by reason of the performance of their activity must be avoided.

Transparency and traceability

The principle of transparency is based on the truthfulness, accuracy and completeness of the information exchanged between the Recipients.

In compliance with the principle of transparency, every operation and transaction must be correctly recorded, authorised, verifiable, legitimate, consistent and congruous. All actions and operations must be properly recorded, ensuring the possibility to verify the decision-making and authorisation process and the related performance.

In compliance with the principle of transparency, any circumstance in which an - actual or even just potential - conflict of interest may arise must be brought to the attention of the appropriate authorities, so that it can be correctly assessed and the necessary countermeasures taken to exclude any possibility of interference between personal interest and the ability to take impartial corporate decisions in the interests of GTL.

Honesty and respect for the law

The Recipients shall not pursue the personal profit of one of the parties, in violation of the laws and regulations in force, as well as the provisions of this Code and Model 231.

Through the implementation of any form of activity and control deemed necessary, the Recipients undertake to comply with the applicable laws and regulations, the provisions issued by the supervisory and control authorities, this Code of Ethics and Conduct and internal regulations, at all decision-making and executive levels.

Loyalty

The Recipients recognise the value of competition when it is based on respect for fair competition vis-à-vis the operators on the market, undertaking not to unduly damage the image of the competitors and the services offered.

Responsibility

The Recipients promote work activities and the performance of company functions with dedication, professionalism, diligence and efficiency, making the best use of the tools and time available and undertaking the related responsibilities,

Good faith

The Recipients undertake to operate without ulterior motives, aware of not harming the interests of others, promoting responsible actions in order not to incur in any misconduct;

1.2 Fight against corruption

No form of corruption is tolerated.

Business is conducted with a view to fighting all forms of corruption or influence peddling. Any conduct adopted with a view to achieving interests or advantages through the undue provision of money, assets or other benefits to induce Public Officials, Public Service Officers or third parties holding senior roles in private counterparties, in order to force or influence them in the exercise of their responsibilities, is prohibited.

Such conduct performed through intermediaries is also prohibited.

1.3 Impartiality

In employment relationships, collaboration contracts and in the conduct of business generally, the equal dignity and impartiality of treatment of all subjects is recognised and

assured, along with the freedom and dignity of people and respect for diversity and equal opportunities.

The Recipients repudiate all forms of discrimination based on the sex, religion, nationality, personal and political opinions, age, health or economic conditions of their interlocutors.

1.4 Confidentiality

The confidentiality of the information acquired in the performance of their work is assured. In this sense, each Recipient shall guarantee the utmost confidentiality of data, news and information acquired and/or processed during the performance of their work and/or the performance of their task or function.

All Recipients undertake to process confidential professional, industrial and commercial data and information in accordance with the rules governing their collection, use and disclosure. The illegal exploitation of the name and reputation of GTL, as well as of the information acquired and business opportunities learned in the performance of their work and/or their assignment or function, in the personal interest or of third parties, is not permitted.

Confidentiality undertakings remain in place even after the termination of their relationship with the GT Line Group.

1.5 Business sustainability

Every initiative for the planning, investment and performance of business activities includes and recognises the fundamental principles of sustainability. To this end, business activities are driven by the definition of strategies to achieve an eco-sustainable future for the planet, the environmental and social context in which it operates and under the best principles of sound corporate governance.

1.6 Efficiency, cost-effectiveness and safeguarding of assets

In every work activity, the cost-effective management and use of GTL's resources must be pursued, in compliance with the most advanced quality standards.

The Recipients also undertake to safeguard the resources and assets of the GT Line Group, including the material and intellectual assets, taking all the necessary precautions to ensure full compliance with the laws and regulations in force. The protection and conservation of these assets constitutes a fundamental value for the protection of GTL's interests, and Recipients are responsible for both protecting these assets and preventing their fraudulent or improper use.

1.7 Personal data protection (privacy)

The protection of the personal data of all natural data subjects who come into contact with their organisation is considered of the utmost importance. In this sense, all Recipients undertake to promptly ensure that the rights granted to the data subjects are assured, protecting their personal data through the adoption of appropriate security measures and preventing any possible risk or prejudice to their fundamental freedoms and rights.

1.8 Value of human resources

Human resources are recognised as a fundamental and indispensable factor for the economic and social development of every organisation.

The Recipients therefore recognise the central role of human resources, who are required to be professional, dedicated, loyal, honest and cooperative. To this end, they are committed to protecting professional development in order to increase the wealth of skills through the systematic attention to the merits of employees, including the ability to express organisational behaviour based on the ethical principles mentioned herein.

No form of irregular employment is tolerated.

Convinced that diversity is a factor that can enrich people, no form of discrimination related to gender, seniority or ethnic or racial origin, religious belief or political or trade union membership is permitted.

1.9 Zero tolerance for harassment at work

Harassment of any kind through discriminatory acts against other people, such as, for example, the creation of a hostile work environment towards individual employees or groups of employees, unjustified interference with the work of others, the creation of obstacles and impediments to the professional prospects of others, bullying or abuse, are not tolerated in the company, by employees or collaborators and generally in the conduct of business.

No gender-based harassment, i.e. the subordination of the potential for professional growth or other advantages to the provision of sexual favours and any other behaviour with a sexual connotation or based on gender, in any case considered undesirable by one of the parties or detrimental to the dignity of the person, shall be tolerated.

1.10 Occupational health and safety

The physical and moral integrity of the company's employees and collaborators, guaranteeing working conditions that respect individual dignity and safe and healthy working environments, with systematic care for the dissemination and consolidation of a

culture of safety and occupational health, developing awareness of the risks and promoting responsible behaviour by all personnel, is an absolute value.

As part of their duties, all the Recipients of this Code are engaged in this risk prevention and health and safety protection process for themselves, their colleagues and third parties. This Code of Ethics, the Risk Assessment Document prepared by the Employer and any other provision within the organisation are easily made available to Recipients in order to ensure effective disclosure and compliance with the procedures for prevention and protection from work-related risks.

In line with each person's role, the Recipients undertake to ensure that third parties acting on behalf of GTL comply with the provisions laid down in the Risk Assessment Document and generally with the requirements of Legislative Decree no. 81/2008, as well as with all the laws and regulations, in force and applicable, on accident prevention and occupational health and safety in the other reference countries.

1.11 Protection of the environment

Environmental protection is a key priority of the business, and must inspire the principles of respect for and protection of the environment and the territory, considered of utmost importance both for their intrinsic value and in relation to their impact on the health of humans and other living species. Environmental protection and striving for quality in the services provided to the Customer is addressed through a structured approach, which takes into account organisational, technical, economic and legal implications in order to act with a sense of responsibility.

The Recipients ensure effective and systematic compliance with the relevant regulatory provisions and recognise the rewarding added value created through policies that set out to continuously improve their organisational and technical capabilities, in order to reduce the environmental impact and improve the quality of their activities in line with the technical and scientific developments in the market in their field of responsibility.

1.12 Commitment to third parties

Knowledge and compliance with this Code of Ethics and Conduct shall not be considered passive or residual conduct within the scope of the duties of each Recipient.

During the performance of any assignment in the name, on behalf and/or in the interest of GTL, all Recipients shall play a proactive role in disseminating the provisions of this Code, demanding compliance with the provisions contained therein in the performance of the activities they have been assigned by GTL and promptly informing the company management or the Supervisory Body, in the event of non-compliance, by third parties, with the obligation to comply with the provisions set out in the Code.

2 Rules of conduct

GT Line Srl has not only established *ethical principles* as essential values underlying its way of conducting business, it has also defined specific *rules of conduct* in relation to the contexts in which irregularities may arise.

In the spirit of prevention that drives this Code of Ethics and Conduct as well as Model 231, of which it is an integral part, the Recipients shall undertake to comply with the rules set out below.

FAILURE TO EXPRESS COMMITMENT TO COMPLY WITH THE PROVISIONS OF THIS CODE OF ETHICS AND CONDUCT WILL JUSTIFY GT LINE SRL THE INTERRUPTION OR TERMINATION OF ANY INDUSTRIAL, COMMERCIAL OR PROFESSIONAL RELATIONSHIP WITH THE RECIPIENT.

On a preliminary and general basis, all Recipients shall:

- i. adopt conduct based on ethical principles, referred to in the preceding chapter 1 and which is fully referred to herein;
- ii. refrain from engaging in or participating in conduct that, considered individually or collectively, may constitute an offence;
- iii. refrain from engaging in and adopting behaviour that, although not in itself any type of offence, may potentially develop in order to commit such offences.

2.1 Relations with the Public Administration

All Recipients of this Code of Ethics and Conduct shall:

- i. in any contact or interaction with officials or bodies of the Public Administration, in the name, on behalf or in the interests of GTL, maintain a fully cooperative and open approach and guarantee behaviour such as not to induce officials of the Public Administration to partial, distorted, ambiguous or misleading interpretations;
- ii. promptly and scrupulously comply with the requirements defined by regulatory, supervisory and control bodies for compliance with the relevant regulations in the sectors related to their activity;
- iii. keep and carefully archive the documentation relating to the discussions with Public Administration officials from which agreements, commitments, authorisations and obligations may apply to GTL;
- iv. refrain from engaging in relations with officials of the Public Administration in the name, on behalf or in the interests of GTL unless expressly authorised or appointed to do so;
- v. refrain from entering into relations with Public Administration officials in the name, on behalf or in the interests of GTL, concealing any situation of actual or potential conflict of interest;

- vi. refrain from promising, granting or paying sums of money or other benefits to Public Officials or Public Service Officers or their relatives and dependants or other entities relating to their sphere of interest, except in the case of gifts or utilities of modest value and/or that have a symbolic value and/or that fall within the normal business courtesy;
- vii. refrain from comply with any unlawful requests made by a Public Official or Public Service Officer who, abusing his position and powers, induces them to unduly give or promise money or other benefits to them or to others close to them;
- viii. refrain from improperly influencing decisions by the Public Administration, including those of officials who deal with or make decisions on behalf of the Public Administration and/or comply with conditions and pressures that could cause GTL to make decisions that are not in line with the provisions of the Articles of Association, internal regulatory provisions, this Code of Ethics and Conduct or Model 231 of GT Line Srl;
- ix. refrain from providing, drafting or delivering to public officials and/or public service appointees statements (including oral statements), data or documents in general that contain inaccurate, incorrect, incomplete, flawed or altered or completely false contents, in order to obtain permits, facilities, disbursements, contributions, concessions, licenses or authorisations of any kind;
- x. refrain from adopting conduct aimed at disturbing the regular performance of tenders, also in the preparatory phase of the calls for tenders;
- xi. refrain from complying with the supply requests made by the Public Administration when consciously aware that the subsequent timely delivery is expected to be impossible;
- xii. refrain from allocating sums received from national or European public bodies by way of disbursements, grants or financing, for purposes other than those for which they were allocated;
- xiii. refrain from accessing a computer or telematic system of the Public Administration or altering its operation or the data contained therein, in order to gain an unfair interest or advantage, causing damage to the Public Administration or to third parties;
- xiv. report, through the platform made available at <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone towards representatives of the Public Administration in the performance of their activities carried out in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.2 Relations with the Judicial Authorities and supervisory bodies

All Recipients of this Code of Ethics and Conduct shall:

- i. in any contact or interaction with judicial authorities and/or their appointed officials, maintain a fully cooperative and open approach and guarantee behaviour such as

- not to induce such officials to partial, distorted, ambiguous or misleading interpretations;
- ii. refrain from promising, granting or paying sums of money or other benefits to representatives of the Judicial Authorities or their staff;
 - iii. refrain from comply with any unlawful requests made by a representative of the judicial authorities and/or their staff or any third-party intermediary who, abusing his position and powers, induces them to unduly give or promise money or other benefits to them or to others close to them;
 - iv. refrain from conduct aimed at improperly influencing the decisions of the judicial authorities and their staff;
 - v. refrain from conduct carried out against anyone, by means of (physical or psychological) violence or threat or by means of a promise of money or other benefits, aimed at making false statements before the judicial authorities or omitting to make statements;
 - vi. report, through the platform made available at <https://gtline.whistlelink.com/>, any (real or alleged) irregular conduct adopted by anyone towards representatives and staff of the judicial authorities, counterparties or third parties called to testimony on matters of interest to GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.3 Relations with interest groups, political parties and trade unions

All Recipients of this Code of Ethics and Conduct shall:

- i. refrain from disbursing contributions or funding to interest groups whose action is not lawful, declared and transparent in the ways pursued to influence the orientation of the institutions on issues of particular interest to the sector to which they belong;
- ii. refrain from disbursing contributions or financing to groups or political parties, or to representatives of the same, in contrast with current regulations or in an attempt to influence their work;
- iii. refrain from disbursing contributions or financing to trade unions, or to members of the same, in contrast with current regulations or in an attempt to influence their work;
- iv. report, through the platform made available at <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone towards functions or representatives of the Public Administration, political parties or groups and trade unions, in the performance of their activities carried out in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.4 Relations with private third parties

All Recipients of this Code of Ethics and Conduct shall:

- i. manage, perform or accept financial transactions that refer to (a) services actually performed or to be performed, (b) services performed between the same parties to which the financial transactions refer, (c) countries where the parties have their respective residence, otherwise documenting and justifying any exceptions;
- ii. verify the reputational reliability of its suppliers and/or industrial, commercial or financial partners, in order to exclude their membership or proximity to criminal subjects or organisations;
- iii. ascertain the possession of the professional requirements, certifications, qualifications, skills and competences, administrative regularity where required for the performance of the tasks assigned to them, in accordance with the laws and regulations governing the sector to which they belong;
- iv. refrain from carrying out any transaction that may contribute to the transfer, replacement or in any case use of illicit proceeds or that may in any way hinder the identification of money, goods or other benefits of criminal origin;
- v. refrain from violating existing legal regulations on the methods of cash collections and/or payments;
- vi. refrain from promising, granting or paying sums of money or other benefits to third-party top management, except in the case of gifts or utilities of modest value and/or that have a symbolic value and/or that fall within the normal business courtesy;
- vii. refrain from providing services to third parties that are not adequately justified in the context of the contractual relationship established with them;
- viii. refrain from recognising remuneration to third parties that is not adequately justified in relation to the type of assignment to be carried out and the practices in force in the local area;
- ix. refrain from receiving or paying sums for supplies or services that do not exist or that are beyond the ordinary course of business;
- x. refrain from providing, directly or indirectly, financial resources or other benefits to persons belonging to or close to criminal subjects or organisations;
- xi. refrain from giving donations to entities and subjects included in the UN List and/or in all the Reference Lists for the prevention of terrorism of any kind;
- xii. refrain from establishing relations with subjects, entities, companies or associations in any form established, in Italy or abroad, which are right or suspected of belonging to or being close to subjects or criminal organisations or those supporting terrorism, or whose identity and, in the case of companies, actual ownership or control ties have not been ascertained with accuracy, diligence and in a traceable and documented manner;
- xiii. refrain from establishing relationships with persons who refuse or are reluctant to provide information relevant to their correct, effective and complete knowledge or with respect to whom there are elements of suspicion, or who request or offer services that, although abstractly beneficial to GTL, may be deemed suspicious or irregular, or who may engage in conduct contrary to current laws and regulations;

- xiv. report, through the platform made available at <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone towards private third party counterparties in the performance of their activities carried out in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.4.1 Conduct contrary to public faith, trade and industry

All Recipients of this Code of Ethics and Conduct shall:

- i. refrain from carrying out any transaction or activity that may constitute fraud in the use physical or digital payment instruments, including cash, debit/credit cards, duty stamps or manipulating and altering the same;
- ii. refrain from placing industrial products on the market with names, trademarks or distinctive signs that could mislead the buyer on the origin, provenance or quality of the products themselves or manufacturing or industrially using objects or other goods made by usurping an industrial property rights held by third parties;
- iii. report, through the platform made available <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone in the performance of industrial or commercial practices carried out in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.4.2 Relations with customers

All Recipients of this Code of Ethics and Conduct shall:

- i. pursue their activities by offering quality products and services at competitive conditions and in compliance with industry standards and those for the protection of consumers and competition;
- ii. base the relationship with their customers on courtesy and satisfaction, also through qualified and competent feedback to any requests and/or complaints made;
- iv. govern commercial relations within specific contracts;
- v. report, through the platform made available at <https://gtline.whistlelink.com/>, any (real or alleged) irregular conduct adopted by anyone in the establishment and definition of contractual agreements in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.4.3 Relations with Suppliers

All Recipients of this Code of Ethics and Conduct shall:

- i. use objective and transparent criteria when selecting suppliers. This choice, in compliance with current regulations and internal procedures, must be made on the basis of verifiable criteria relating to competitiveness, quality and economic conditions;
- ii. undertake to ensure compliance with the principles of this Code of Ethics and Conduct and the regulations in force, in particular the legislation on the use of the workforce, occupational safety and environmental protection, including - among others - what concerns child and women's labour, regular forms of employment, the safeguarding of trade union rights or in any case of association and representation;
- iii. ensure the requirements of qualification, capacity and technical and professional reliability, as well as the regularity of administrative, salary and social security matters;
- iv. govern commercial relations within specific contracts / orders for the supply of goods or services;
- v. report, through the platform made available at, <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone in the establishment and definition of contractual agreements in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.5 Administration and financial disclosure

All Recipients of this Code of Ethics and Conduct shall:

- i. ensure truthful and correct financial information on their economic, equity and financial situation;
- ii. ensure transparent, complete, accurate, traceable and clear accounting and administrative management, in full compliance with the rules governing bookkeeping, as well as the preparation of the financial statements and other corporate disclosures required by law and addressed to shareholders and third parties;
- iii. clearly report on the choices, actions and performance of sustainability in the Environment, Social & Government (ESG) field, illustrating the demands emerging from continuous dialogue with stakeholders and stating the medium-long term ESG objectives to which the organisation aspires;
- iv. maintain conduct based on professionalism and collaboration with the control bodies responsible for supervising the management and accounting control and auditing the financial statements of the GT Line Group companies;

- v. strictly comply with legal measures intended to protect the company's share capital and keep it intact, to defend the interests of creditors and third parties in general and to ensure the exercise of rights by entitled third parties;
- vi. ensure the regular operation and performance of the GT Line Group companies and corporate bodies, facilitating and ensuring all forms of internal control over corporate management provided for by law as well as promoting the free formation and adoption of the decisions of the GT Line Group;
- vii. implement a prudent tax policy, in compliance with the rules and regulations governing tax obligations and the determination of the direct and indirect tax burden and excise duties;
- viii. ensure full transparency, cooperation and good faith in discussions - in any capacity - with the Financial Administration;
- ix. refrain from providing, drafting or transmitting inaccurate, incorrect, incomplete, flawed and/or non-responsive data or documents, such as to constitute an untrue description of reality, with regard to the economic, equity and financial situation of the GT Line Group companies;
- x. refrain from engaging in any conduct contrary to the provisions of the Italian Civil Code;
- xi. report, through the platform made available at <https://gtline.whistlelink.com/>, any (real or alleged) irregular conduct adopted by anyone in the drafting, control or disclosure of relevant financial information in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.5.1 Tax management

All Recipients of this Code of Ethics and Conduct shall:

- xii. refrain from forcibly elusive interpretations of tax legislation or fraudulently aimed at subtracting taxable amounts from the Financial Administration;
- xiii. refrain from preparing false or fabricated deeds, documents, certificates or provide even verbal information in order to mislead the Financial Administration or hinder or condition its assessments;
- xiv. refrain from conduct aimed at altering the tax base, whether its own or that of third parties, by issuing or recording documents certifying transactions that are objectively or subjectively non-existent or of a value that does not correspond to the actual transaction;
- xv. refrain from conduct aimed at concealing or destroying deeds or documents of probative value for accounting and tax purposes or aimed at reducing the balance sheet of the companies of the GT Line Group in order to reduce the amount for the

- compulsory collection of tax charges or to condition any transactions with the Financial Administration;
- xvi. refrain from carrying out any real or simulated act of distraction to the detriment of the GT Line Group's creditors, including the Financial Administration;
 - xvii. report, through the platform made available at <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone in the fulfilment of requirements towards the Financial Administration in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.6 Correct use of data and IT systems

All Recipients of this Code of Ethics and Conduct shall:

- i. use IT or telematic tools and services in full compliance with current regulations on the matter (in particular, on offences related to computing, computer security, privacy and copyright) and internal procedures and for the corporate purposes for which they were assigned
- ii. guarantee the confidentiality of data and information managed by means of IT systems and applications, protecting them from improper or unauthorised access to databases or during transmission and storage, ensuring that the information is accessible only to authorised persons;
- iii. guarantee the integrity of the data and information managed by means of systems and applications, protecting them from unauthorised modifications or alterations;
- iv. ensure the availability of data and information managed by means of systems and applications, ensuring their availability and usability according to the needs of business continuity and in compliance with the rules that require their long-term conservation;
- v. protect and safeguard the equipment in use granted by GTL and contribute to the protection of data and corporate assets as a whole, avoiding situations that may adversely affect their integrity and security;
- vi. refrain from illegally accessing an IT or telematic system protected by security measures without appropriate authorisation and within the limits of the purposes for which the authorisation is granted;
- vii. refrain from destroying, damaging, deleting, altering or suppressing third-party information, data, documents or computer programs;
- viii. refrain from any other conduct aimed at violating the infrastructures, systems and IT or telematic applications of third parties, including the Public Administration, in order to unduly obtain, alter or destroy documents, data or information, regardless of whether such conduct directly or indirectly damages the rights of others;
- ix. report, through the platform made available at <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone in the use of IT and

telematic data and infrastructures in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.6.1 Use of social media platforms

All Recipients of this Code of Ethics and Conduct shall:

- i. base their conduct, in the professional use of any social media platform, on the values and principles of this Code of Ethics and Conduct. "Professional use" must be understood as the circumstance through which the Recipient formally identifies themselves - on social media - as part of the GTL organisation or declares facts and circumstances from which it can reasonably be assumed that they belong thereto;
- ii. refrain from issuing statements that do not officially reflect the position of the GT Line Group as a manifestation of their individual ideas or issued in their personal capacity;
- iii. refrain from the use of expressions that are not appropriate to the corporate role or offensive or denigrating towards anyone.

The aforementioned cases also apply in cases where the conduct is by persons who - although outside the GT Line Group - are part of the third-party Recipient organisations, in cases where they report facts, events or circumstances on social media that involve the direct or indirect involvement of the GT Line Group companies.

In cases where the aforementioned conduct damages the image and integrity of the GT Line Group and the Employer, they may be censored pursuant to the Disciplinary System.

- iv. report, through the platform made available at <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone through the improper or undue use of social media, and other means of dissemination that could damage GTL and/or its counterparties or is in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.7 Conflict of interest

All Recipients of this Code of Ethics and Conduct shall:

- i. refrain from carrying out or facilitating operations in actual or potential conflict of interest with the GT Line Group, as well as any activity that may interfere with the ability to take impartial decisions in the best interests of the GT Line Group and in full compliance with the rules of this Code of Ethics and Conduct;
- ii. promptly inform the GT Line Group corporate management of any situations in which a conflict of interest could occur between the Recipient and GTL;

- iii. report, through the platform made available at <https://gtline.whistlelink.com/>, any (real or alleged) irregular conduct adopted by anyone that constitutes a personal conflict of interests of the role held in the name, on behalf or in the interests of GTL or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

The Recipients respect the decisions that, in this regard, are taken by the GT Line Group.

2.8 Respect for people

All Recipients of this Code of Ethics and Conduct shall:

- i. ensure forms of employment for workers that comply with labour regulations, respecting the dignity of people and consistent with their competence, skills and experience required;
- ii. ensure, in the case of employment of people from other countries, the ability to understand the language and the instructions given by the Employer;
- iii. ensure appropriate prevention and protection measures against the risks in the workplace and the training and instruction necessary for the protection of their own health and safety and that of other workers;
- iv. stigmatise and prevent all forms of discrimination and harassment in the workplace;
- v. refrain from establishing employment relationships, including through intermediaries, the conditions of which could constitute the exploitation of workers;
- vi. refrain from establishing working relationships with persons without a residence permit or encouraging acts aimed at illegally procuring the entry of foreigners into the territory of the Italian State or another State;
- vii. refrain from promoting organisations, associations, movements or groups whose purposes include incitement to discrimination or violence on racial, ethnic, national or religious grounds;
- viii. report, through the platform made available at <https://gtline.whistlelink.com/>, any (real or alleged) irregular conduct adopted by anyone towards workers, third party representatives of clients and suppliers and, more generally, any other person who comes into contact with GT Line Group companies or in violation of the ethical principles and rules of conduct referred to in this document and/or in the Model 231 of GT Line Srl.

2.9 Occupational health and safety

All Recipients of this Code of Ethics and Conduct shall:

- i. due to the role played in the company and the related responsibilities, ensure (a) compliance with the regulatory provisions on the prevention of accidents at work

- and fire regulations; (b) the risk assessment and identification of the consequent prevention and protection measures; (c) the training and instruction of workers; (d) the adoption of emergency plans; (e) the correct performance of health surveillance activities;
- ii. take care of their own safety and health and that of others in the workplace, who may be affected by their actions or omissions, in accordance with the instructions issued by the Employer and other figures responsible for the operation of the occupational safety management system;
 - iii. correctly and safely use all machinery, plants and equipment, means of transport and other work equipment;
 - iv. use the collective and personal protective equipment made available by the Employer appropriately;
 - v. protect and safeguard the assets of the GTL Group companies and contribute to the protection of corporate assets as a whole, avoiding situations that may adversely affect their integrity and security;
 - vi. report immediately to the Employer for security purposes, to the Prevention and Protection Service and any other parties involved in the security management system, any shortcomings in the devices referred to above, and any other hazards they may become aware of, taking direct action, in urgent circumstances, within the limits of their responsibilities and capabilities, to eliminate or reduce such shortcomings or hazards, informing the workers' health and safety representative;
 - vii. promptly notify the occupational physician of states of chronic alcohol or drug addictions that have an impact on work performance and that may disturb the normal performance of the same;
 - viii. refrain from carrying out their activities under the influence of alcohol or drugs, or substances that have a similar effect, and from consuming such substances during the course of their work;
 - ix. refrain from removing or modifying safety, warning or monitoring devices without authorisation;
 - x. refrain from undertaking, on their own initiative, operations or procedures which are not assigned to them or which may put their own safety or that of other workers at risk;
 - xi. refrain from engaging in conduct in violation of company principles and procedures, or other company provisions on occupational health and safety;
 - xii. refrain from engaging in reckless, negligent or imperious behaviour that may constitute a safety risk, for themselves or others, in the workplace;
 - xiii. refrain from carrying out work activities or using machinery and instrumentation without having previously received adequate instructions on operating procedures or without having previously participated in training courses;

- xiv. refrain from omitting to report any incapacity or inexperience in the use of company tools;
- xv. report, through the platform made available at <https://gtline.whistlelink.com/>, any (real or alleged) irregular conduct adopted by anyone in violation of the occupational safety requirements and (or other corporate instructions issued by the Employer or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.10 Protection of the environment

All Recipients of this Code of Ethics and Conduct shall:

- i. avoid engaging in reckless, negligent or imperious behaviour in the exercise of their duties that may constitute a risk to the environment;
- ii. ensure - according to competence, role and responsibility - the correct and timely fulfilment of the requirements received for the issuance and obtaining of environmental authorisation certificates;
- iii. protect and safeguard the assets of the GTL Group companies and contribute to the protection of corporate assets as a whole, avoiding situations that may adversely affect their integrity and security
- iv. report, through the platform made available at <https://gtline.whistlelink.com/>, any (real or alleged) irregular conduct adopted by anyone that causes damage to the environment or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

2.11 Copyright protection

All Recipients of this Code of Ethics and Conduct shall:

- i. obtain from the respective owners and/or licensors of the rights of use and exploitation relating to any asset, subject to protection under the rules on copyright, specific declarations aimed at attesting to the following main circumstances: (a) to be the legitimate holders of the economic exploitation rights over the assets being transferred or, in any case, to have obtained from the legitimate holders the authorisation to grant them in use to third parties; (b) to ensure that the assets being transferred or granted in use do not infringe any third-party intellectual property rights; (c) to undertake to indemnify and hold GTL harmless from any damage or prejudice of its assets or otherwise, which may arise, as a result of the untruthfulness, inaccuracy or incompleteness of such declarations;
- ii. refrain from installing software on the computer equipment provided by GTL without authorisation;

- iii. refrain from unlawfully reproducing or distributing recordings or videos of musical or audiovisual works;
- iv. refrain from reproducing, transferring to another medium, distributing, communicating, presenting or demonstrating in public the content of a database without having previously obtained the necessary authorisation from the legitimate owner of the copyright and/or the right of economic exploitation of the database.
- v. report, through the platform made available at <https://gtline.whistlelink.com/> any (real or alleged) irregular conduct adopted by anyone in violation of the copyright laws or in violation of the ethical principles and rules of conduct referred to in this document and/or in Model 231 of GT Line Srl.

3 Implementation and control of compliance with the Code of Ethics and Conduct

3.1 Tasks of the Supervisory Body

Control over the implementation and compliance with the Code of Ethics and Conduct is entrusted to the Supervisory Body of GT Line Srl, appointed pursuant to Art. 6 of Legislative Decree no. 231 of 8 June 2001.

In addition to fulfilling the tasks referred to in the aforementioned decree in relation to Model 231 adopted by GT Line Srl - to which reference should be made for more details - the Supervisory Body of the parent company has been appointed to:

- check the compliance with the Code of Ethics and Conduct, with a view to reducing the risk of the commission of the offences provided for in Italian Legislative Decree no. 231/01;
- make their comments on ethical issues that may arise in the context of decisions of the GT Line Group companies, as well as on alleged violations of the Code of Ethics and Conduct of which they become aware;
- provide the interested parties with all the clarifications and explanations required regarding the correct interpretation of the provisions of this Code of Ethics and Conduct;
- monitor and coordinate the updating of the Code of Ethics and Conduct, also through its own proposals for adaptation and/or updating;
- promote and monitor the implementation of communication and training activities on the Code of Ethics and Conduct;
- manage the reports, received through the appropriate communication channels made available by the GT Line Group, in cases concerning any violations of the

Code of Ethics and Conduct, promoting the procedures for disciplinary assessment with the relevant administrative bodies and verifying their effective application.

ANYONE WHO BECOMES AWARE OF (REAL OR ALLEGED) CONDUCT IN VIOLATION OF ETHICAL PRINCIPLES AND RULES OF CONDUCT IS REQUIRED TO PROMPTLY REPORT THIS USING THE CHANNEL:

[HTTPS://GTLINE.WHISTLELINK.COM](https://gtline.whistlelink.com)

Following the receipt of the report, the SB carries out an investigation to determine its validity, implementing any initiatives aimed at investigating the reported content. In this context, it may, where appropriate, hear the author of the report (where known) and/or the person responsible for the alleged violation and/or any other person it deems useful, justifying in writing any conclusion reached.

Any reports that, following the investigation, prove to be well-founded, will be notified – net of sensitive elements or in any case covered by confidentiality – to the Administrative Body for the relevant disciplinary assessments.

Anyone who receives a report is required to promptly notify the SB directly, ensuring its integrity and confidentiality or by entering the report on the platform indicated above.

THE SB IS THE GUARANTOR OF THE CONFIDENTIALITY OF THE WHISTLEBLOWER AND THE CONTENTS OF THE REPORT.

GT LINE SRL UNDERTAKES TO PREVENT ALL FORMS OF RETALIATION, DISCRIMINATION OR PENALTY AGAINST PERSONS WHO HAVE MADE REPORTS IN GOOD FAITH, EVEN IN CASES WHERE THEY PROVE TO BE UNFOUNDED

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