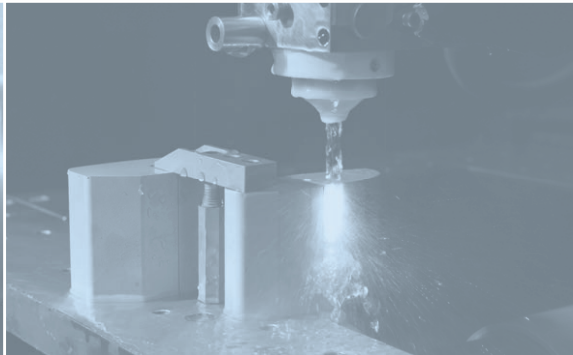
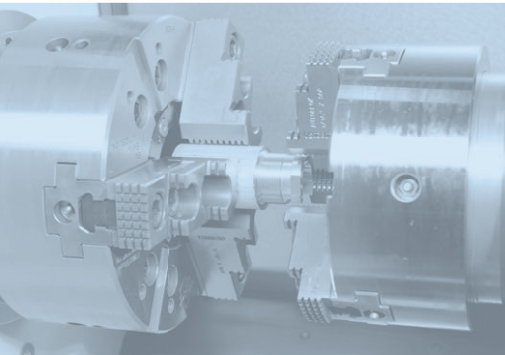
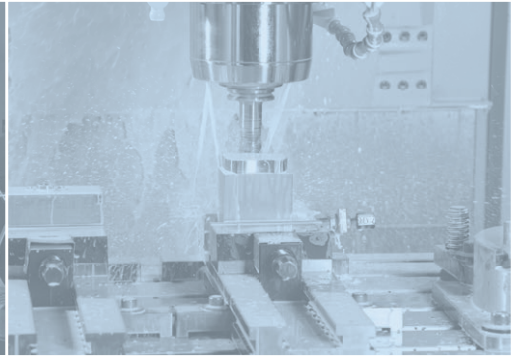
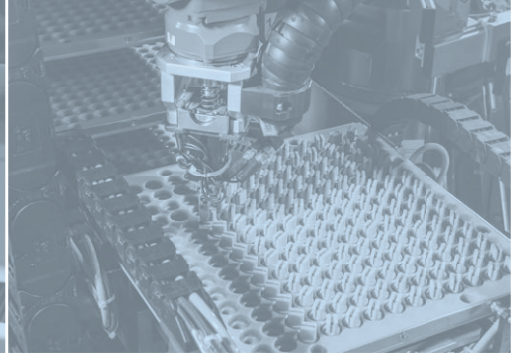
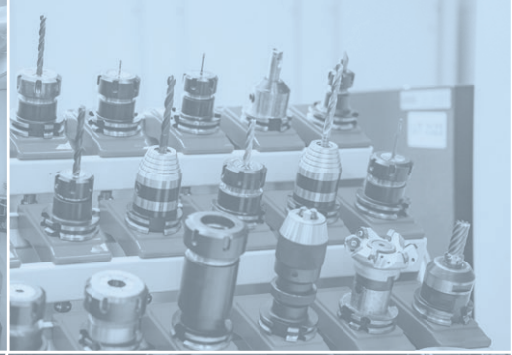
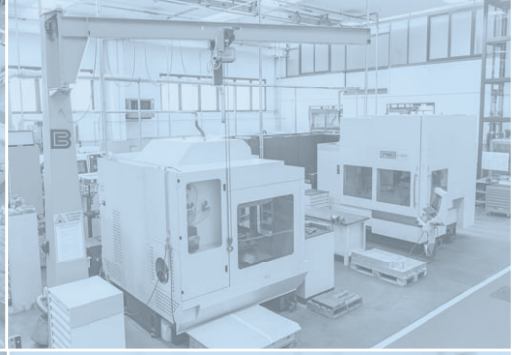




Code of Ethics



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FOREWORD

La.Ra. SRL (hereinafter **La.Ra**) is a company that, since its establishment in 1975, has operated in the field of precision mechanical machining.

Since its foundation, La.Ra. has been strongly committed to keeping pace with technological progress, consolidating and expanding its market, and maintaining an agile organisation capable of responding competently and flexibly to customer requirements, constantly adapting to changes in both the market and society at large.

Doing business today requires more than simply working well, generating profit, investing, expanding the company, and developing the skills of all collaborators. All these elements must certainly have their place in the life of any enterprise, but they must be pursued with the awareness that a company is part of a broader socio-economic, human, cultural, and environmental context. In other words, any business today must also meet strong expectations of economic, environmental, and social sustainability. Companies must therefore develop and implement technical, organisational, and financial solutions capable of optimising the balance between performance and resource consumption, minimising environmental impact, and safeguarding the health and safety of all those involved in the production process.

The Management Body of La.Ra. is fully aware that every company is an active part of a society that strives to improve its quality of life and has high expectations of all those operating in the economic sector, expectations that require, above all, correct and responsible behaviour towards all stakeholders engaged with the company.

In this regard, the already complex regulatory framework in the administrative and financial spheres, as well as that concerning workers' health and safety, environmental protection, energy efficiency, and people's development, is not sufficient to guide behaviour based on moral values. Hence the need to codify such behaviours in some way, formalising and communicating them through an appropriate instrument.

The **Code of Ethics** fully meets these needs. It does not replace or overlap with laws or internal and external regulations; rather, it represents a tool that complements and reinforces the principles contained within the legislative framework, adding concrete elements to conduct and guiding them in a specific way, in full respect of the company's history and identity.

The Code of Ethics also represents a public declaration of La.Ra's commitment to promoting and pursuing the highest standards of integrity in achieving its corporate mission—an effort that La.Ra. has long implemented through adherence to operational standards and behavioural rules integrated within its own Integrated Management System.

GUIDE TO READING AND USING





1 GUIDE TO READING AND USING THE CODE OF ETHICS

As already stated in the foreword, this Code of Ethics is not intended to be a mere formal declaration of intent, nor simply a document outlining shared and morally acceptable principles shaped around the company's identity and respectful of its history and mission. On the contrary, this Code of Ethics contains actual rules of conduct that La.Ra's Management Body has chosen to codify and which require attention and compliance. This chapter therefore defines the scope within which the Code of Ethics is deemed applicable.

1.1 Recipients

The provisions of the Code of Ethics apply without exception to:

- The Chair of the Board of Directors;
- The members of the Board of Directors;
- The Shareholders;
- The Heads of Corporate Functions;
- Employees and Collaborators;
- Any other individual, private or public, who directly or indirectly establishes any form of relationship or collaboration—whether temporary or permanent—with La.Ra

1.2 Application

The subjects to whom this Code is addressed (the Recipients), already required to comply with the law and applicable regulations, shall align their conduct and actions with the principles, objectives, and commitments expressed in this Code of Ethics.

Each Recipient must provide professional and personal contributions appropriate to their role and must always act in a manner that safeguards both their own reputation and that of La.Ra.

La.Ra's Shareholders and Directors, each within their respective competences, must act in full alignment with the company's values and perform their duties while maintaining strict confidentiality regarding corporate actions and documentation to which they have access or knowledge.

Shareholders and Directors must likewise maintain discretion even with respect to actions about which they disagree, refraining from disseminating their opinions either within or outside La.Ra.

La.Ra Employees, in addition to acting with loyalty, fairness, and good faith in the performance of their duties, must comply with company rules and those of the Code of Ethics, and must refrain from engaging in any activity in competition with La.Ra's operations.



Each Process and/or Function Manager is required to:

- act as a role model through their own behaviour;
- promote compliance with the Code of Ethics;
- ensure that subordinates understand that adherence to the Code of Ethics is an essential component of work quality and of their role;
- take immediate corrective action whenever required by circumstances;
- act to prevent, within their area of responsibility and competence, any violation of this Code.

External Collaborators of La.Ra are required to maintain maximum confidentiality regarding activities, actions, information, and documents they may become aware of or possess. They must also refrain from using materials or tools made available to them for purposes or interests of their own or for any reason unrelated to their engagement with La.Ra.

1.3 Personal Conduct

All Recipients are required, even in their private behaviour, to maintain conduct that in no way harms the interests or image of La.Ra in particular, they are required to:

- Contact their superiors or designated functions whenever clarification is needed regarding the application of the Code;
- Report any information, whether directly observed or relayed by others, concerning potential violations of the Code of Ethics;
- Disclose any request received to breach the Code;
- Cooperate with those responsible for verifying possible violations.

If a Recipient becomes aware of unlawful situations or conduct contrary to the principles of this Code of Ethics that may, directly or indirectly, generate an interest or advantage for La.Ra, they must inform the Shareholders directly. In such cases, the Recipient is exempted from the requirement to follow the established corporate hierarchy and may report directly to the Board of Directors or the Chair of the Board, particularly when the violation involves individuals at a higher hierarchical level.

Members of the Board of Directors and the Shareholders commit to mutual communication regarding received reports and to prompt handling of such cases, ensuring the whistleblower's anonymity.

Relationships among Recipients must be guided by fairness, collaboration, and mutual respect. Therefore, abusing the duty to provide information for retaliatory or merely competitive purposes constitutes behaviour contrary to the ethics expressed in this Code.

1.4 Verification

Direct verification of the conduct prescribed by this Code of Ethics—and more broadly of compliance with legal provisions—is primarily entrusted to the Shareholders, who exercise this function directly or through the company organisation. For this purpose, the



Shareholders may rely on competent external parties or acquire data and information from existing corporate governance activities such as internal audits or compliance assessments.

All Recipients must be open to verification of the correct application of this Code and of legal provisions, carried out in accordance with applicable laws and internal regulations.

1.5 Dissemination

La.Ra promotes adherence to the principles set out in the Code of Ethics through:

- Dissemination of the Code among Recipients and all those who engage with La.Ra;
- Updating and expanding the Code based on regulatory developments and changes in the company's operating context;
- Implementing information programs for external Recipients and training for internal ones to improve understanding of the Code's content and objectives;
- Conducting objective and impartial assessments regarding reported violations of the Code;
- Applying disciplinary measures in response to verified breaches;
- Fully protecting those who provide information about possible violations of the Code of Ethics.

The text of the Code of Ethics is delivered to all internal Recipients and made available for consultation on the company's website at:

www.officialara.com/azienda/codice-etico.pdf

Internal Recipients are invited to familiarise themselves with the Code of Ethics; each receives a copy upon hiring or upon signing their employment contract.



ETHICAL PRINCIPLES





2 ETHICAL PRINCIPLES

This Code helps to ensure that the activities and conduct of those to whom it applies are carried out in compliance with the values set out below.

Under no circumstances can the belief that one is acting in the interest or to the advantage of La.Ra justify behaviour that is contrary to the principles expressed in this Code of Ethics.

2.1 Honesty

Honesty represents the fundamental principle for all of La.Ra's activities, initiatives, reporting and communications. It is an essential element of company management.

La.Ra is therefore committed to complying with all laws, codes, regulations, directives, and generally recognised good practices.

No corporate objective may ever be pursued in violation of applicable rules.

2.2 Transparency and Completeness of Information

La.Ra collaborators must provide information that is complete, transparent, clear, and accurate so that, when establishing relations with the company, the Shareholders are able to make autonomous and informed decisions regarding the interests involved, the alternatives available, and their relevant consequences.

In particular, when drawing up contracts, La.Ra takes care to specify clearly and comprehensibly the conduct expected from its counterparties under all foreseeable circumstances.

2.3 Confidentiality

La.Ra ensures the confidentiality of the information in its possession, complies with data protection regulations, and refrains from seeking confidential or sensitive data except in cases of express and informed authorisation and in compliance with applicable legal provisions.

Furthermore, La.Ra's collaborators must not use confidential information for purposes unrelated to their professional duties, such as market manipulation, unfair competition, or mere personal curiosity.

2.4 Integrity

La.Ra is fully committed to ensuring the physical and moral integrity of its collaborators, maintaining working conditions that respect individual dignity, promoting courteous conduct, and providing a safe and healthy working environment.

To continuously improve its ability to protect workers, La.Ra has implemented an Occupational Health and Safety Management System, which is certified and monitored by an accredited third-party body in accordance with international standards.



La.Ra exercises vigilant oversight to ensure that no altercations, intimidation, bullying, harassment, or any behaviour that could be classified as abusive occur in the workplace.

Requests or threats aimed at inducing individuals to act against the law or the Code of Ethics, or to behave in a way that violates personal or moral convictions, are not tolerated.

Within interpersonal relations, La.Ra promotes an ethical culture based on kindness — that is, the creation of a working environment founded on care, respect, and active listening. The company encourages and supports conduct that demonstrates attentiveness and consideration towards others, fostering thoughtful and respectful relationships while maintaining full respect for individuality and avoiding any form of insistence or intrusion.

2.5 Equality and Impartiality

La.Ra rejects all forms of discrimination based on age, gender, ethnicity, nationality, political beliefs, or religious faith in all decisions affecting relationships with Shareholders, employees, collaborators, and all stakeholders.

No position, role, or function within La.Ra is precluded to any category of worker — for example, women or foreign nationals — provided that the legal and professional requirements for the role are met.

For specific categories of workers, such as pregnant or breastfeeding employees, La.Ra adopts all necessary measures to safeguard their health and safety, in compliance with applicable legal provisions.

2.6 Exercise of Authority

La.Ra's Shareholders are aware that the authority conferred by their ownership status represents first and foremost a service to be exercised responsibly, especially when making decisions that may affect the future of the company and its people.

Therefore, in the establishment and management of contractual relationships involving hierarchical structures — particularly those with employees — La.Ra is committed to ensuring that authority is exercised with fairness and integrity, avoiding any form of abuse.

In particular, La.Ra guarantees that authority is exercised in the true spirit of service and does not become an exercise of power that undermines the dignity or autonomy of collaborators.

2.7 Balance in collaborations

Contracts and work assignments must be carried out according to what has been consciously and mutually agreed between the parties.

La.Ra undertakes not to exploit situations of ignorance or incapacity on the part of its counterparties, nor any position of contractual strength in its dealings with suppliers or collaborators.



2.8 Fairness in Contract Management

Anyone acting in the name and on behalf of La.Ra must refrain from taking advantage of contractual loopholes or unforeseen events to renegotiate agreements solely for the purpose of exploiting a counterparty's dependency or weakness.

Similarly, in relationships with employees, Shareholders must avoid exploiting opportunities that could infringe upon the worker's freedom or dignity, even if such opportunities are not explicitly prohibited by law.

2.9 Social Responsibility

La.Ra recognises the direct and indirect influence its activities can have on the living conditions, economic and social development, and overall well-being of the community, as well as the importance of maintaining the social acceptance of the communities in which it operates.

For this reason, La.Ra aims to conduct its investments with respect for local and national communities and supports cultural and social initiatives that contribute to improving its reputation and social integration.

2.10 Support for Vulnerable Groups

In line with the moral principle of sharing prosperity, La.Ra is committed to dedicating part of its profits to supporting vulnerable individuals and groups.

On occasions such as Christmas holidays, anniversaries, commemorations, or significant corporate milestones, La.Ra provides financial contributions and donations to recognised charitable organisations involved in activities such as medical research, support for families affected by rare diseases, and aid for humanitarian missions in developing countries.

2.11 Connection with the local area

Since its foundation, La.Ra has remained rooted in the city of Saluzzo and its surrounding area.

Fully aware that any entrepreneurial initiative has an impact on the local community — in terms of employment opportunities, skills development, and economic growth — the Management Body of La.Ra has made a deliberate decision to remain within the territory where the company was born and has grown.

Relocating the company's headquarters is therefore not considered an option, even when potential economic or growth benefits may appear attractive.

The ability to do business despite local challenges is one of the enduring values that has always guided La.Ra's decisions.



2.12 Environmental Protection

The environment is a fundamental asset that La.Ra is committed to safeguarding. To this end, the company plans its production activities by seeking a balance between economic initiatives and essential environmental requirements, in consideration of the rights of future generations.

La.Ra is committed to improving the environmental impact of its operations and to preventing risks to people and the environment — not only in compliance with current legislation but also by taking into account scientific progress and best practices in the field. To ensure continuous improvement in its interaction with the environment, La.Ra has long implemented an Environmental Management System, which is certified and monitored by an accredited third-party body in accordance with international standards.

2.13 Use of energy and Natural Resources

As part of its environmental protection initiatives, La.Ra pays increasing attention to energy efficiency and the responsible use of natural resources, committing to progressively reduce the carbon footprint of its processes.

Regarding energy, La.Ra's photovoltaic system allows the company to generate an amount of renewable electricity equivalent to its consumption.

As for the use of natural resources, water employed in mechanical processing is circulated within a closed system to avoid continuous withdrawals.

The use of natural gas for heating is constantly monitored, and any equipment found to be inefficient is promptly replaced.

La.Ra maintains up-to-date technical knowledge in the energy sector and actively pursues ecological transformation, particularly regarding heating systems and new transport solutions.

2.14 Skills Development

La.Ra believes in the development of its personnel's skills and rejects a narrow, task-based view of work.

Employee autonomy in carrying out their duties has always been one of the company's strengths.

Therefore, new recruits undergo extended periods of mentoring and are subject to on-the-job evaluation to identify their abilities and potential for further skill development.

2.15 Workplace Decorum

A fundamental component of respect for people and the environment is the decorum of the workplace — the spaces in which individuals spend a significant part of their day. Order and cleanliness, both indoors and outdoors, have always been essential priorities for La.Ra.



This principle is also reflected in structural, plant, and space management decisions, with the conviction that it is possible to maintain a sense of elegance and order even in industrial environments.

For this reason, continuous cleaning services, care of green areas, maintenance of yards and external storage areas, and the protection of waste storage and hazardous material warehouses are all considered crucial aspects.

2.16 Modesty in Gifts

Towards all stakeholders, La.Ra does not permit any form of gift, gratuity, or promise of future benefits that might be interpreted as exceeding normal acts of courtesy typical of standard business practice.

Initiatives aimed at obtaining illicit preferential treatment in business dealings are strictly prohibited.

This conduct is particularly required in relations with public officials, their relatives, or associates.

Permitted forms of courtesy must be of modest value and aimed at promoting La.Ra's image or supporting initiatives endorsed by the company in favour of stakeholders, the environment, or the community.

Such initiatives must in all cases be approved by the Shareholders and supported by appropriate documentation.

The same rules apply to gifts and gratuities given to employees, collaborators, professionals, or other parties in business relations with La.Ra.

2.17 Fairness in cases of Conflict of Interest

In conducting any activity, situations must be avoided where those engaging in business with La.Ra are, or may even appear to be, in a conflict of interest.

This includes cases where a collaborator pursues an interest different from the company's mission or takes personal advantage of business opportunities belonging to La.Ra, as well as cases where representatives of customers, suppliers, or public institutions act in ways that conflict with their fiduciary duties.

Any individual who believes they may be in a situation of conflict between their own personal interest — or that of third parties — and that of La.Ra must immediately inform the Shareholders and comply with their decisions regarding the matter.

The background is a teal color with a faint image of a group of people shaking hands. A large, semi-transparent teal circle is centered on the page, containing the title text. In the bottom right corner, there is a white icon of a clipboard with a checklist. The checklist has three items: the first two are checked with a checkmark, and the third is marked with an 'x'.

RULES OF CONDUCT AND RELATIONS WITH SHAREHOLDERS





3 RULES OF CONDUCT AND RELATIONS WITH SHAREHOLDERS

3.1 Ethical Principles in Relation to Corporate governance

The appointment of members of the Corporate Bodies takes place through transparent procedures. These bodies act and deliberate with full awareness and independence, pursuing the objective of creating value for La.Ra and its owners, in compliance with the principles of legality and fairness.

Independence of judgement is an essential requirement for the decisions of the Corporate Bodies; therefore, their members guarantee maximum transparency in managing operations in which they may have specific interests.

La.Ra promotes transparency and regular communication with its Shareholders, in compliance with current laws and regulations. Shareholders are guaranteed accurate and timely information regarding any action or decision that may affect their investments. The interests of all Shareholders are promoted and safeguarded, rejecting any form of partiality or personal interest.

La.Ra also encourages the regular participation of Shareholders in assemblies and ensures the right of every Shareholder to obtain clarification, express opinions, and make proposals.

La.Ra is committed to disseminating accounting information with the highest degree of transparency, reliability, and integrity. Every operation involving financial transactions is to be properly recorded, authorised, legitimate, consistent, appropriate to the company's objectives, and made available for any necessary verification.

All accounting actions and operations must be supported by adequate documentation, allowing the verification of decision-making, authorisation, and implementation processes.

Recipients who become aware of omissions, falsifications, or negligence must report such circumstances to the Managing Director and/or the Chair of the Board of Directors.

3.2 Ethical Principles in Relations with Personnel

La.Ra upholds the principles of equality and equal opportunity in personnel selection and recruitment, rejecting any form of favouritism, nepotism, or patronage. Staff evaluation is based on the correspondence between the candidate's professional profile and the requirements necessary to meet the company's needs.

Employment relationships are formalised through regular contracts; all forms of irregular work are rejected.

Recipients must promote maximum transparency and cooperation with new recruits to ensure that they have a clear understanding of their assigned role. Upon commencing employment, new hires receive comprehensive information regarding their position and



the company's organisation. They are also required to acknowledge, accept, and sign the rules and procedures related to occupational safety, environmental protection, and compliance with this Code of Ethics.

La.Ra promotes conditions that enhance well-being at work and safeguard the physical and moral integrity of individuals. To this end, it ensures clean, orderly workplaces that comply with legal provisions on health, safety, and environmental protection.

La.Ra fosters a culture of safety and raises awareness among all employees regarding workplace risks. To this purpose, a suitable prevention system is implemented and responsible behaviours aimed at protecting personal and environmental integrity are defined. La.Ra encourages such behaviour through initiatives of participation and engagement, training activities, and recognition systems that reward active contributions to safety and environmental improvement.

All collaborators must constantly comply with all applicable laws and best practices concerning health, safety, and environmental protection. They must also comply with La.Ra's internal policies and regulations whenever these impose stricter requirements than those established by law.

To further raise awareness regarding workplace well-being, La.Ra prohibits the consumption of alcoholic beverages during working hours and advises employees to maintain this restriction in the periods immediately preceding work shifts or entry to the company premises, including lunch breaks organised for the hospitality of customers or visitors.

For the same reason, La.Ra adopts the principles of a **No Smoking Company**: therefore, smoking is strictly prohibited in all indoor areas — offices, production departments, restrooms, and support areas such as the canteen and changing rooms. Smoking is only permitted in designated and clearly marked outdoor areas, although smokers are nevertheless encouraged to abstain.

La.Ra aims to create a work environment free from any form of physical or psychological discrimination or harassment; such conduct or any behaviour that could cause discomfort or create a hostile atmosphere is not tolerated.

To foster a serene working environment characterised by mutual respect, La.Ra promotes relationships based on kindness and consideration, particularly in communication and collaboration among people. Accordingly, sexual harassment — whether actual or suspected — as well as exaggerated displays of personal affection, even if legitimate, and any sexually suggestive behaviour or speech that could offend or disturb another person, particularly women of any age, nationality, or background, are strictly prohibited (for example, the display of sexually explicit images, persistent innuendo, etc.).

Employees or collaborators who believe they have been victims of harassment or discrimination related to gender, ethnicity, health status, nationality, political convictions, religion, sporting or cultural preferences, personal habits, or any other unjustified reason based on reasonable and objective criteria, are free to report the matter to the Shareholders, who will carefully assess whether this Code of Ethics has been violated and, if necessary, take appropriate measures.



3.3 Ethical Principles in the Use of Company Assets

Every employee and collaborator must use company assets diligently, protect their integrity, and avoid using them for personal purposes or for any reason other than those for which they were provided. Fraudulent or improper use of assets and equipment intended for the performance of assigned duties must be avoided or prevented.

Each Recipient is responsible for the security of the IT systems and communication tools they use and must comply with applicable laws and software licensing agreements. Except as provided by civil and criminal law, the improper use of company assets and resources includes:

- using electronic connections for purposes unrelated to the employment relationship with La.Ra;
- sending offensive messages or messages that could damage La.Ra's image or interfere with work activities;
- using online connections for entertainment or recreational purposes, particularly where such use involves inappropriate or disordered behaviour (e.g. access to pornographic content);
- accessing the information systems of other parties to obtain information, cause damage, interrupt services, or appropriate access codes.

Every Recipient must also make every effort to prevent the potential commission of crimes through the use of IT tools. IT equipment and related access rights must only be used as provided by authorised company functions.

3.4 Ethical Principles in Relations with Third Parties

Customers. Relations with customers are based on the highest level of cooperation and transparency, aimed at mutual benefit. Company personnel — particularly those responsible for design and development — must maintain the correct balance between transparency and the confidentiality required to protect corporate know-how. Achieving this balance requires adherence to Management's instructions and contractual commitments.

All personnel involved in customers relations must act with courtesy and availability in their interactions.

Suppliers. The processes for selecting and evaluating suppliers are based on the principles of legality, fairness, and transparency. Supplier selection is guided by objective and impartial criteria such as quality, innovation capacity, cost, and service level.

Violation of the principles of legality, fairness, transparency, confidentiality, fair competition, or respect for individuals constitutes just cause for terminating supply contracts. If Recipients receive proposals from suppliers offering benefits to gain favour, they must immediately suspend the relationship and report the incident to the Shareholders.

Public Administration and Public Bodies. For the purposes of this Code, "Public Administration" refers to any public entity or independent administrative agency, as well as any



natural or legal person acting as a public official. This definition also includes private entities that, for political or economic reasons, perform functions serving the public interest — such as regulatory authorities, certification bodies, telecommunications companies, public transport companies, and energy suppliers.

It is strictly forbidden to offer or promise money, gifts, or compensation of any kind; to exert illicit pressure; or to promise any object, service, benefit, or favour to managers, officials, or employees of the Public Administration — or to their relatives or associates — with the aim of inducing them to perform an unlawful act or an act contrary to their official duties. The same applies when the intent is to favour or harm a party in a civil, criminal, or administrative proceeding for the purpose of obtaining a direct or indirect advantage for the company.

Anyone receiving explicit or implicit requests for benefits from Public Administration representatives, as defined above, must immediately suspend all relations and inform the Shareholders.

It is prohibited to use or present false statements or documents, or to obtain information for the purpose of securing grants, funding, contracts, or other forms of aid benefiting the company.

It is equally prohibited to mislead others through deception in order to obtain undue profit for La.Ra., especially when the misled party is the State or a public body responsible for funding or financial support programmes.

It's forbidden to use grants, loans, or other public funds for purposes other than those for which they were granted.

Political Parties and Interest Groups. La.Ra may maintain relations with trade associations, unions, and similar organisations with the aim of developing its activities, establishing mutually beneficial forms of cooperation, and presenting its views. Public presentation of company positions to political or other organisations may only occur with the formal consent of the Shareholders' Assembly.

La.Ra may support initiatives proposed by public or private entities and non-profit organisations that promote the values expressed in this Code, through contributions or sponsorships in accordance with company procedures. Such initiatives may relate to social, political, cultural, artistic, or sporting events of collective or company-specific interest.

Competitors. La.Ra avoids making negative comments or judgements about competitors, instead favouring fair competition based on the quality and transparency of products and services.

Anyone acting, directly or indirectly, in the name or interest of La.Ra must always comply with the following:

- may not use names or trademarks likely to cause confusion with those legitimately used by others, nor imitate competitors' products or undertake actions that could create confusion with their products or activities;
- may not spread false information or make disparaging remarks about competitors' products or activities, nor claim credit for others' achievements;



- may not employ any means contrary to professional fairness that could harm other organisations;
- may not engage in acts of violence or threats against anyone, particularly persons directly or indirectly associated with competing organisations.

With regard to the **Judicial Authorities**, directors, managers, employees, and anyone else associated with La.Ra. must behave with the utmost cooperation, transparency, and honesty.

No one may use violence, threats, offers, or promises of money or any other benefit to induce a person to refrain from giving testimony or to provide false statements before judicial authorities, whether in criminal or civil proceedings.

Any conduct contrary to the above must be immediately reported to the Shareholders, or to the Chair of the Board of Directors if the Shareholders are directly involved.



RULES FOR THE IMPLEMENTATION OF THE CODE OF ETHICS





4 RULES FOR THE IMPLEMENTATION OF THE CODE OF ETHICS

4.1 Dissemination and understanding

La.Ra aims for its Code of Ethics to be fully effective and for its contents to become an operational practice for all Recipients. To this end, the company:

- undertakes to disseminate the Code of Ethics among all internal and external stakeholders through communication activities, using various channels suited to the characteristics of each audience (for example, by delivering a copy of the Code to all collaborators, by including dedicated sections on the corporate intranet or website, in relevant company documents, or through other targeted information initiatives);
- in particular, commits to ensuring the understanding of the Code of Ethics and providing the necessary clarification to all employees and collaborators, for whom the Code is considered an integral part of their employment relationship, through training programmes aimed at promoting knowledge of the principles and rules contained and/or referenced therein;
- undertakes to periodically monitor compliance with the Code and to keep Recipients informed of the progress made in implementing its commitments.

4.2 Interpretative Clarifications and Reporting of Violations

To ensure the correct interpretation of applicable laws and this Code of Ethics, La.Ra relies on the expertise of external professionals or on the trade associations to which it belongs. This ongoing updating activity aims to:

- keep the Shareholders and all company collaborators informed and updated on legislative and regulatory developments;
- provide interpretative and operational clarification of applicable laws;
- verify compliance with the provisions of this Code of Ethics and with the preventive procedures adopted, including those within the Integrated Management System;
- detect or receive reports of any unlawful acts committed within the organisation and inform the company's governing bodies;
- carry out internal audit activities and promote the application of the prescribed disciplinary procedures.

La.Ra is committed to ensuring that everyone clearly understands the reporting system for violations and knows who to contact for clarification regarding the interpretation of the Code.

La.Ra takes the principles outlined in this Code very seriously and therefore requires those in positions of responsibility to demonstrate an even greater commitment to respecting these principles and supporting their dissemination and understanding at all levels.

With regard to reporting, there is an obligation to communicate within 48 hours any violations or irregularities identified in the course of normal activities — particularly those that constitute behaviour inconsistent with this Code of Ethics or with the provisions of



the Integrated Management System — as well as any other offence and/or breach of laws, regulations, or applicable rules.

4.3 Protection in reporting

In compliance with whistleblowing regulations, La.Ra guarantees the complete confidentiality of the identity of any person who makes a report, whether using traditional means (oral or written) or electronic systems.

The relevant contact details (addresses, emails, and phone numbers) are published or updated via the company intranet, website, or specific internal communications.

Failure to comply with the obligation to report violations constitutes a serious breach of this Code.

Failure to respect the hierarchical reporting structure, unless duly justified, also constitutes non-compliance with this Code.

Likewise, any failure to protect the confidentiality of a person who has submitted a report in the interest of La.Ra represents a violation of this Code. Retaliatory or discriminatory actions (including dismissal or reassignment) against such persons as a result of their reports will not be tolerated.

Reports found to be unfounded and made with intent or gross negligence expose the author to disciplinary consequences, as they too constitute a violation of the Code of Ethics.

4.4 Disciplinary System

In accordance with the regulations, documents, and laws referred to in this Code of Ethics, the Shareholders' Assembly defines the types of violations of this Code and the disciplinary, legal, or criminal sanctions to be applied. These are formalised in a regulation known as the "Disciplinary System", which is submitted for unanimous approval by the Shareholders' Assembly.

The Disciplinary System is subject to updating in line with any changes to applicable legislation.

The Disciplinary System is communicated to the interested parties, who may express their opinions and submit proposals, which are then reviewed and discussed by the Shareholders' Assembly. The Assembly's considerations on these proposals are formally communicated to the parties involved.

4.4 Updating

La.Ra believes that a tool such as the Code of Ethics can only be effective if it accurately reflects the company's policies and procedures. For this reason, the company is committed to integrating and/or revising the Code and/or company procedures whenever necessary to address situations not covered in the current version, to clarify existing provisions, or to adapt to new requirements of any nature.

The updating of the Code of Ethics is entrusted to the Shareholders' Assembly.



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