

STIGA GROUP CODE OF ETHICS



We believe...

In the power of **simplicity**:

making the complex intuitive.

In **giant leaps**, not small steps.

In questions, not answers.

Because **curiosity** drives us.

In breaking the rules and **challenging** convention,

while working in harmony with nature.

In putting **people** first –

giving them the power they need,

when and where they need it.

In having the **courage** to do the right thing –

for our people, customers and planet.

In doing more with less but performing better.

In the strength of **logic** and rationality.

In the power of imagination and **magic**.

In the joy and ever-changing wonder of gardening.

And, above all, knowing that if you look after the planet,

it will look after you.

We are **green-fingered engineers**.

We are STIGA.

STIGA

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Introduction

The companies belonging to the Stiga Group (hereafter also referred to as "STIGA GROUP" or "STIGA") have been operating in the gardening sector for over 90 years, designing, manufacturing and distributing tools and machinery for garden care throughout Europe and the world.

In this complex multinational scenario, STIGA GROUP deems it important to clearly indicate the values, principles and rules of conduct considered the basis of its business conduct.

For this reason, this Code of Ethics has been prepared (hereafter also known as the "Code of Ethics"), in compliance with the applicable legislation, guidelines and best practices existing at national and international level, in terms of human rights, social responsibility business and corporate governance.

The adoption of this Code of Ethics aims to satisfy the needs and expectations of all the internal and external stakeholders of the STIGA GROUP (including employees, collaborators, trade unions, shareholders, customers, final consumers, suppliers, schools and universities, institutions belonging to the Public Administration, media, local communities and NGOs) in order to establish a reality oriented towards compliance, and ethical and behavioural standards, focused on the excellence and reliability of the commercial activity carried out by STIGA.

This Code of Ethics is divided into six sections:

1. scope of application and recipients;
2. the mission;
3. values;
4. principles;
5. rules of conduct;
6. implementation of and compliance with the Code of Ethics.

1. Scope of application and recipients

This Code of Ethics applies to all companies belonging to the Stiga Group.

Therefore, the recipients of this Code of Ethics are all those who, within each company of the STIGA GROUP: hold representative, administrative or management functions or who exercise, even de facto, management and control; all employees without exception; those who cooperate, including by virtue of a temporary interim or para-subordinate employment relationship, and collaborate with these companies – for whatever reason – in the pursuit of their objectives; and – more generally – service providers, commercial partners and anyone who entertains business relationships with one of the STIGA GROUP companies (hereafter also known as the "Recipients").

2. The mission

STIGA is one of the world's largest manufacturers and distributors of gardening equipment.

STIGA uses its know-how and skills to continually improve the solutions its products provide, making the care of the home garden a simple activity to be carried out in harmony with nature.

STIGA has been on the market for many years through its five brands – Stiga, Castelgarden, Alpina, Mountfield, Atco – representative of the Group's mission.

The STIGA brands:

- **Stiga:** established in 1934, with its long tradition Stiga is synonymous with Swedish quality and ease of use. Strongly oriented to offer its customers technologically innovative solutions, Stiga is not only the market leader in Northern Europe but, due to the success of its products there, is expanding its role of reference with significant growth across the wider European market.
- **Mountfield:** for 30 years it has been the reference brand in the UK market. Mountfield's range of products is developed, designed and manufactured to make gardening a real pleasure. The quality of its products, together with a distribution network recognised for its excellent customer service, makes Mountfield the leading brand in the UK market.
- **Atco:** with close to 100 years of market presence – one of the longest-lived in the sector – Atco is one of the most iconic garden equipment brands; a cornerstone of the market in Europe and beyond.
- **Alpina:** Alpina is an Italian brand dedicated to serving the demands of the "do it yourself" (DIY) market and large-scale distribution. Voted best for serving customer needs by offering optimal solutions, Alpina recently celebrated its 50th anniversary with new and innovative products.
- **Castelgarden:** established in 1962, this brand offers specialist customers the appeal of an Italian-designed product at an excellent quality-to-price ratio. Best known for lawn tractors and lawn mowers, it nevertheless offers a complete range of attractive, accessible and easy-to-use products, including brush cutters, hedge trimmers, chainsaws and blowers for all types of gardens.

The OEM and Private Label market

STIGA is a partner of primary importance for the "OEM" and "Private Label" market.

Its expertise in providing customised products to the "OEM" and "Private Label" market, together with its customer-focused "branded" offerings, make STIGA a unique proposition in the garden care equipment market. With this commercial strategy, STIGA aims to become the most competitive player, as well as the largest development centre, for the international market of lawnmowers and gardening equipment.

STIGA in the world

STIGA is present in approximately 100 countries around the world, including through its own commercial companies located in all major European markets. Thanks to this diversified presence, STIGA can meet the specific needs of each individual market and distribution channel in a timely and flexible manner. Its production structure located in various European plants, together with its factory in China, guarantees the best quality-to-price ratio for all product categories.

3. Values

STIGA's values (hereafter known as the "Values") are simplicity, unity, innovation, garden care and action. In particular:

Simplicity

Simplicity for Stiga means creating products that are reliable but at the same time practical, intuitive, easy to use and focused on facilitating the real needs and aims of the consumer.

Unity

Unity means collaboration. Stiga is founded on family values of openness, inclusion and teamwork.

Innovation

In Stiga we look to the future. We have a long history of innovation.

We are curious and motivated by the desire to improve and optimize ourselves every day, making the organization and processes more and more efficient.

Thanks to our team of "green thumb" engineers, we create innovative solutions, through research and development, technical skills, experience and cutting-edge technologies.

Garden care

Taking care of gardens – like all green spaces – means taking care of the health of our planet. This is why, when designing and creating our products and solutions, we pay particular attention to being in harmony with nature.

Action

We are proactive, always trying to anticipate the needs of our customers.

We are constantly involving ourselves in ever-changing projects, with an open and collaborative spirit.

Our products combine the logic of engineering with the magic of creativity, in order to be more competitive and to quickly transform ideas into practical improvements. We believe responsibility, decision making and action at all levels are an important part of true teamwork.

4. Principles

The work and organisation of STIGA GROUP is inspired by the following principles (hereafter known as the "Principles"):

- **Legality**: all the behaviours of the Recipients in the context of the work carried out on behalf of, or in the interest of, STIGA are based on the most rigorous compliance with the national, EU and international laws in force and applicable to STIGA or to the management of any relationship with STIGA itself.
- **Professionalism**: the Recipients are called on to carry out the activities associated with their roles with the utmost commitment, diligence, professionalism, moral rigour and correctness, as well as to fulfil contractual obligations and requisite services with loyalty and in good faith, protecting their reputation and the image of STIGA.
- **Focus on people**: respect for our people is central to everything we do. For this reason, STIGA employs procedures and methods for selecting, hiring, training and managing personnel based on respect for the value, rights and responsibilities of workers, and the importance of promoting their development and professional growth. This allows all STIGA employees and collaborators to work with pride, positivity, dedication, creativity, friendship, motivation and a focus on personal growth. Furthermore, STIGA promotes and guarantees compliance by all necessary measures to protect health, safety, human dignity and moral integrity in all places where employees and collaborators are called on to carry out their work.
- **Fairness and impartiality**: in relation to its stakeholders, and in the exercising of its business activities, STIGA does not tolerate any form of discrimination regarding sex, sexual orientation, age, nationality, state of health, political opinions, race or religious beliefs, or any other prejudice.
- **Sustainability**: STIGA is aware of the influence, even indirectly, that its activities can have on the economic, environmental and social conditions of the territories in which it operates. For this reason, it has undertaken to follow a path of sustainability, with the aim of integrating these values into the STIGA GROUP's business processes, in full compliance with the current legislation.
- **Environmental protection**: STIGA recognises the environment as a shared resource to be safeguarded and developed. For this reason, one of the goals of the STIGA GROUP is to pursue an environmental policy, defined as the search for the right balance between environmental impact and economic growth, to improve its performance in terms of developing energy saving and sustainable solutions. To do so, STIGA is committed to raising the awareness of its staff regarding the environmental aspects and impacts of their activities. Furthermore, STIGA undertakes to use processes, technologies and raw materials that help reduce the consumption of natural resources and have the lowest environmental impact, in compliance with permits, licenses and public authorisations.
- **Loyalty and transparency**: STIGA recognises the value of disseminating clear, correct, complete and accurate information and communications, both internal and external, and ensures maximum transparency in terms of its processes and activities. STIGA thereby operates in a sound manner and establishes honest, loyal and lasting relationships with its stakeholders, based on trust and credibility.

- **Confidentiality and protection of privacy**: STIGA ensures the confidentiality of personal data and of information that constitutes the company's assets, even when applied to third parties, by adopting suitable protection measures. STIGA also protects processed personal data, avoiding any improper use, in compliance with relevant regulations and internal procedures.
- **Contractual compliance**: in relationships with contractual counterparties, STIGA guarantees all compliance with current regulations, ensuring timely and comprehensive sharing of information on all matters relating to its business and without exploiting advantageous situations due to its counterparties' inadequate information or knowledge.
- **Quality and customer satisfaction**: STIGA undertakes to guarantee compliance with the highest product and process quality standards and to ensure that the products and services offered meet the needs and expectations of the customer. STIGA believes it to be of the utmost importance that the expectations of its customers are systematically identified, translated into requirements and then promptly and appropriately met.
- **Excellence, experience, innovation and reliability**: STIGA uses know-how, methodologies and technologies resulting from the company's long experience in the gardening sector to create value linked to successful initiatives and to design increasingly advanced and cutting-edge products, in compliance with legal obligations and requirements or applicable regulations.
- **Prevention of corruption**: the Group does not admit any form of offer, receipt or direct or indirect promise of payment or other benefits towards public administration, customers, commercial counterparties and third parties in general, which is not strictly derived from the law or by a contractual obligation or by a business relationship governed by a contract.
- **Prevention of conflict of interest**: in conducting all company activity, personnel will work impartially, taking decisions with responsibility, transparency and according to objective evaluation criteria, and avoiding situations where they are, or may appear to be, in conflict of interest. By conflict of interest, we mean any case in which personnel pursue an interest of their own or of third parties, other than that of STIGA, or carry out activities that may, in any case, interfere with their ability to make decisions in the exclusive interest of STIGA, or could allow them to take personal advantage of business opportunities. Anyone who is involved in a conflict of interest is required to notify their immediate superior or the Group Internal Audit Manager and refrain from carrying out the conflicting activity until appropriate assessment of the situation.
- **Prevention of money laundering and the fight against organised crime and terrorism**: STIGA guarantees maximum transparency and traceability in commercial operations and in relations with third parties, in full compliance with national and international regulations on the fight against money laundering. In particular, STIGA promotes correct conduct in business activities and prohibits any conduct, acts of omission or methods that may favour illegal activities, or related conduct of an illegal nature, both nationally and internationally.

- **Protection of competition**: for STIGA it is of primary importance that the market, and the forms of STIGA's agreements and business practices, are based on correct and fair competition, in compliance with the current European and international antitrust laws.
- **Protection of industrial and intellectual property**: STIGA guarantees compliance with legislation on the protection of trademarks, patents and other distinctive signs and in the field of copyright, and prohibits conduct aimed, in general, at counterfeiting, duplication or reproduction, in any form and without right, of the work of others.

5. Rules of conduct

This section highlights the standards of conduct (hereafter also known as the "Rules of conduct") that the Recipients must observe as well as enforce.

5.1 Staff and collaborators

This section applies to:

1. those who perform, even de facto, management, administration, direction or control functions for STIGA or for one of its autonomous organisational units;
2. STIGA employees even if posted abroad to carry out their work;
3. those who collaborate with STIGA by virtue of a temporary, interim or para-subordinate employment relationship.

Personnel selection, hiring and management

In the course of selecting employees and collaborators, STIGA carries out assessments comparing required profiles with the profiles of the candidates, together with transparent considerations of merit.

STIGA offers all employees and collaborators the same job opportunities in order to ensure fair and non-discriminatory treatment based on merit and on the values of equality, tolerance and mutual respect.

STIGA therefore adopts appropriate measures to avoid any form of discrimination and favouritism, not allowing prejudice for reasons of nationality, skin colour, religious belief, political affiliation, trade union, sex or other reasons.

The processes involved in the selection and hiring process must therefore:

- adopt criteria of merit and competence, and take place on a strictly professional level, for any decision relating to an employee or collaborator;
- select, hire, train, remunerate and manage employees and collaborators without any discrimination based on sex, race, age, religion;
- create a work environment in which personal characteristics are not a source of discrimination;
- create a respectful and dignified work environment, in which everyone can best contribute to the development and growth of the company with their potential and abilities.

Furthermore, the companies of the STIGA GROUP undertake and guarantee:

- not to establish any employment relationship with persons without a residency permit and not to carry out any activity aimed at favouring the entry of illegal persons, in compliance with the immigration regulations in force in the various Countries;
- the protection of minors, assigning maximum importance to the prevention of exploitation of any kind put in place against them.

STIGA is aware that qualified and loyal employees and collaborators are an intangible asset of the greatest importance, necessary for achieving company goals and maintaining optimal quality standards.

Therefore, the creation and maintenance of a calm, conducive and proactive work environment is considered essential, as is the protection of equal opportunities for employees and collaborators, guaranteeing growth paths based exclusively on personal merits and abilities. For this reason, STIGA aims to develop the skills and competences of each employee and collaborator, and allow their individual energy and creativity to be fully expressed, in order for them to fully realise their potential in relation to the needs of the business.

The evaluation of employees and collaborators takes place according to merit-based criteria regarding objectives discussed, agreed and shared, recognising that they have been fulfilled only when the agreed results have been achieved, in line with company policies that define these annual objectives based on feasible, specific, concrete and measurable results and achieved within the expected time frame.

Any situations involving difficulties or conflicts with the aforementioned principles must be promptly reported to a superior and the Group Human Resources Manager who will assess the need for any corrective actions.

Furthermore, STIGA offers training courses aimed at combining the needs of company growth with the training needs expressed by the workers, providing adequate refresher and professional development tools.

Compliance with laws and regulations

STIGA employees and collaborators must behave ethically, honestly, decently and diligently in the context of the work performed, and in personal and professional relationships. Relationships between collaborators at all levels must be based on principles of loyalty and mutual respect.

Ethical conduct also includes compliance with all laws, regulations and procedures applicable to the performance of the work in question and with this Code of Ethics.

STIGA undertakes to ensure that each employee and collaborator is aware of the legal requirements relating to their function, and is thus able to recognise potential issues, and understand the appropriate behaviour and actions, in situations characterised by risk.

Respect for the law and the fight against organised crime and terrorism

STIGA expects its employees and collaborators to avoid any acts or behaviours that could facilitate the commission of the crimes introduced by the New York Convention of 12/9/1999 for the suppression of the financing of national and international terrorism.

STIGA recognises the primary importance of all actions aimed at preventing the use of the financial system for the purpose of money laundering and the financing of terrorism.

In particular, STIGA promotes the principle of correct conduct in business activities and prohibits conduct, omissive acts or methods that may favour illegal activities, or related conduct of an illegal nature, both nationally and internationally.

Ethical conduct also includes compliance with all laws, regulations and procedures applicable to the performance of the work in question and with this Code of Ethics.

STIGA recognises the primary value of the principle of fighting organised crime. Any behaviour that may constitute or be connected to organised criminal activities is therefore forbidden and completely conflicts with STIGA's values.

Each collaborator must report any behaviour or situation that threatens the economic and commercial freedom of STIGA to the Group Internal Audit Manager. All situations of threat, extortion or blackmail that limit the activity of STIGA to the advantage of other companies or persons related to national or international criminal organisations must be reported.

Protection of workers' health and safety

STIGA is committed to ensuring a work environment compliant with current occupational health and safety regulations, through the prevention, continuous monitoring and management of risks associated with the performance of professional activities to avoid and / or prevent them at source.

STIGA's goal is to prevent accidents or illnesses linked to workplace conditions by implementing all necessary or appropriate actions, such as, for example: continuous training for company personnel on the activities carried out in the course of their work, and on safety issues; continual investment in the purchase of machinery compliant with prevention and safety standards and the constant maintenance of existing equipment; the control and updating of working methods; as well as all employees and collaborators comply with the standards required by law and company regulations.

Duties of the staff

Each employee and collaborator must adequately carry out the responsibilities of their role with commitment and professional rigour and must act in such a way as to protect the prestige and reputation of STIGA.

All employees and collaborators at all levels must work together to maintain a climate of mutual respect for the personal dignity, honour and reputation of everyone, intervening against any disrespectful or defamatory attitudes or behaviour.

Collaboration and sharing are considered integral qualities for STIGA employees as they help to create a harmonious and stimulating work environment based on mutual trust and respect. In this way, a positive climate of collaboration develops within the organisation, allowing valid and effective solutions to be found to any problem encountered during working life. Everyone must try to contribute to improving operational efficiency and achieving outstanding performance.

STIGA prohibits any form of unlawful behaviour. It requires that during their work and at any time in the workplace, the staff comply with the following rules:

- not to work under the influence of alcohol or drugs;
- not to consume or sell narcotic substances for any reason during the performance of their work.

STIGA also requires that no cases of harassment occur in internal and external work relationships, meaning as such:

- the creation of an intimidating, hostile or isolating work environment for individuals or groups of workers;
- unjustified interference with the performance of other people's work;
- creating obstacles to the individual job prospects of others for reasons of personal competitiveness;
- conduct and behaviours that give rise to sexual harassment, such as making decisions relevant to the recipient's working life based on the acceptance of sexual favours; proposals for interpersonal relationships of a sexual nature despite an express refusal, which have the ability to affect the recipient's working life.

Conflict of interest

Every decision and action during the employment relationship must be taken exclusively in the interest of STIGA and not in consideration of any kind of personal relationship or advantage.

All employees and collaborators must avoid situations in which conflicts of interest may arise and must refrain from taking personal advantage of possible business opportunities related to the performance of their duties.

By way of example, but not limited to, it constitutes a conflict of interest to:

- have economic and financial interests, including through family members, with customers, suppliers, competitors, the Public Administration, etc.;
- use one's position in STIGA, or the information acquired in carrying out one's work activity, in such a way as to create a conflict between one's own interests and those of STIGA.

Anyone who finds themselves operating in a conflict of interest is required to straight away notify their immediate superior and to refrain from carrying out the potentially conflicting activity until an appropriate assessment of the situation has been made.

The employee's superior must inform the Group Internal Audit of the situation, and of the actions implemented, according to the principle of transparency and in compliance with company procedures and applicable legislation.

Gifts and benefits

STIGA employees and collaborators, or any of their close family members, may not receive money, gifts, utilities or benefits from third parties (eg. Public Administration, customers, suppliers etc.) or take any undue advantage for themselves or for STIGA. Nor are they allowed to offer cash or other benefits that could be construed as bribery.

Therefore, any promise or payment of money, gifts, utilities or benefits to any official institutions, or to any family or friends, or to anyone belonging to Public Administrations is prohibited.

Acts of commercial courtesy towards customers or suppliers, such as gifts or hospitality, are permitted provided they have been previously and duly authorised by the relevant office and only when they are of modest value, and in any case such as they will not compromise the integrity or reputation of any of the parties and cannot be interpreted by an impartial observer as aimed at giving an advantage, even if not economic, contrary to mandatory laws or regulations.

Use of company resources

Each STIGA employee and collaborator is required to operate with the diligence necessary to protect company resources and assets through responsible behaviour and in line with the operating procedures set up to regulate their use, avoiding any improper use that may cause damage, reduce efficiency or in any case contrast with corporate interests.

Likewise, it is the responsibility of the employees and collaborators not only to protect these assets and resources but also to prevent their fraudulent or improper use to the advantage of third parties or even to STIGA.

Finally, it is good practice that all STIGA employees and collaborators, whatever their role, undertake to contribute to order and safety both in the office and within the plant and to avoid any form of waste.

STIGA's IT equipment must be used in full compliance with current laws and specific internal procedures.

It is also forbidden, and completely against the principles of STIGA and its employees and collaborators, to use the company's IT tools to carrying out or facilitate conduct relating to, or potentially relating to, the crime of child pornography, including through virtual images.

Confidentiality of information

STIGA's activities continually require the acquisition, storage, processing, communication and dissemination of news, documents and other data relating to negotiations, administrative procedures, financial transactions, know-how (contracts, deeds, reports, notes, studies, drawings, photographs, software) or data that cannot be disclosed externally due to contractual agreements and whose inappropriate or untimely disclosure could harm the company's interests.

Each employee and collaborator is therefore required to ensure the confidentiality of each piece of information acquired during the carrying out of their job role.

The information, knowledge and data acquired or processed by the employees and collaborators during or through the performance of their work duties, even if not in the workplace, belong to STIGA and cannot be used, communicated or disclosed without the specific authorisation of the STIGA departments or employees responsible for this.

Furthermore, employees and collaborators are required not to use or treat such information in a way that makes it accessible to unauthorised personnel in the workplace, at home, in public places or elsewhere. The

use of computers or other electronic devices at home, and access to the Internet during air travel or in any off-site situation, therefore require special attention.

Transparency and accuracy of information

In their employment relationship with STIGA, all employees and collaborators must guarantee the truthfulness, transparency, accuracy and completeness of the documentation and information they provide in carrying out their job roles. Operations and / or transactions must be recorded accurately and, where required, authorised and supported by appropriate documentation.

Employees and collaborators involved in the preparation of accounting records or financial statements must use due diligence to ensure that such records and documents are truthful and correct. STIGA condemns any behaviour aimed at altering the accuracy or truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law, or disseminated to the public and addressed to collaborators, supervisory authorities, the board of statutory auditors, auditors or any other stakeholders.

5.2 Suppliers and partners

By suppliers we mean all those who supply goods and / or services to STIGA. The collaboration of our suppliers makes it possible for STIGA to continually meet or exceed our customer's expectations in terms of quality, cost and delivery times.

The partners category, on the other hand, includes subjects who act in the name and / or on behalf of and / or in the interest of STIGA GROUP by virtue of a mandate, other contractual collaborative relationship, conferment of office or powers and / or other agreements (e.g., distributors, dealers, agents or consultants, joint venture partners or associates, for the realisation or acquisition of a business project etc.).

STIGA establishes potentially long-term relationships with its suppliers and partners and bases each agreement on criteria negotiated with fairness and transparency in line with good commercial practices, in a context of trust and collaboration, avoiding situations of dependence that could jeopardise the business.

Selection of suppliers and partners

For the selection of suppliers, objective and impartial evaluation criteria are adopted, mainly around reliability, quality, technical preparation, efficiency and cost-effectiveness, but also in terms of their adherence to social and ethical principles as a prerequisite for becoming a STIGA GROUP supplier and developing a lasting commercial relationship with the companies of the Group.

While favouring the consolidation and continuity of relationships, STIGA does not preclude any suitable supplier from competing to win a contract.

As part of initiatives such as joint ventures or equity investments in companies, STIGA chooses its partners in relation to their good reputation, reliability and credibility in the reference market, as well as in relation to compliance with the Values and Principles pursued by STIGA GROUP and expressed in this Code of Ethics.

STIGA also selects qualified operators and partners, observing the principles and internal company procedures, with a view to guaranteeing in the relationship the maximum collaboration and transparency, to the advantage of all parties and to satisfy the expectations of the end customer.

Duties of suppliers

STIGA GROUP suppliers must ensure that their employees' working conditions are based on respect for fundamental human rights, international conventions and applicable laws.

In particular:

- the use of child labour is absolutely prohibited and considered unacceptable. The age of workers and production workers cannot be less than the minimum legal age allowed in each country;
- the exploitation of child and non-child labour, the use of forced labour, physical or mental abuse or corporal punishment are considered unacceptable and will result in the immediate termination of all relationships between the supplier and STIGA;
- the remuneration and benefits of workers and production staff must comply with local regulations and be in line with the provisions of the relevant international conventions;
- any form of forced or compulsory labour, including human trafficking or slavery, will not be tolerated by STIGA;
- suppliers must ensure that all work is carried out using manufacturing processes that protect the health of workers in an appropriate and adequate way for the work in question.

Payments, gifts and benefits

Remuneration to be paid to suppliers of goods and services must always be commensurate with the service indicated in the relevant contract.

STIGA absolutely forbids the offering or receiving of gifts and / or benefits (money, objects, services, favours or other benefits) to / from suppliers and partners and / or their representatives (potential or actual) such as may lead to unlawful conduct or, in any case, such as may be interpreted by an impartial observer as intended to obtain an undue advantage, even if not economic, from the relationship.

Protection of the safety and health of suppliers

STIGA undertakes to protect the health and safety of suppliers who carry out activities at STIGA offices / plants with adequate preventative organisational and technical measures.

STIGA will ensure that the requirements of its contractors correspond over time to those of the company, and the legislation of the country where the plant or the place of the contract are located.

Confidentiality of information and intellectual property

In compliance with relevant legislation, STIGA will maintain the necessary confidentiality on strategic, confidential or intellectual property information of its suppliers and partners, from whom it expects the same behaviour.

Respect for ethical principles

After evaluating whether it is necessary, STIGA may decide to send this Code of Ethics to suppliers and partners, requesting acknowledgement of receipt and compliance to the Code by the signing of its contents.

5-3 Customers

Leadership in our sector and customer satisfaction are STIGA's main objectives, which push us to continually improve performance.

STIGA strives for excellence and aims to maintain the high quality of the products and services it offers to customers, in line with their needs and requirements, as well as current regulations.

In the context of customer relations, all employees and collaborators are required to:

- apply internal procedures for managing relationships with customers in order to develop and maintain favourable and lasting relationships with them;
- not arbitrarily discriminate against clients, nor seek to unduly exploit positions of strength to their disadvantage;
- always respect the commitments and obligations undertaken towards customers;
- adopt a style of behaviour towards customers based on efficiency, collaboration and courtesy;
- provide accurate, complete and truthful information to allow customers to make informed decisions;
- specifically comply with the provisions of the appropriate paragraph if the customers are representatives of the Public Administration.

Finally, it is forbidden for any employees and collaborators to be involved for any reason in the marketing of products and services having any characteristic (by origin, provenance, quality, quantity) other than those agreed or declared, or bearing names, brands or distinctive signs that might mislead the customer about the quality, origin or provenance of the products / services offered.

Product safety and innovation

STIGA pays constant attention to technological research to offer innovative and reliable products. It guarantees the customer maximum safety when using its products and informs them of any associated risks, including through testing carried out by certifying bodies and / or by STIGA itself.

Compensation, gifts and benefits

Remuneration for the sale of STIGA products or services must always be consistent with the contract and commensurate with the product performance. It is absolutely forbidden to offer (or receive), directly or

indirectly, gifts and / or benefits (money, objects, services, favours or other benefits) to / from customers that could be interpreted by an impartial observer as an advantage to either party – even if non-economic – contrary to mandatory laws, regulations and the principles of this Code of Ethics.

5-4 Public Administration

The term Public Administration refers to all those subjects, under public or private law, who perform a public function or a public service, with whom STIGA and its collaborators interact.

This area includes by way of example, but not limited to, local public bodies (Municipalities, Provinces, Regions etc.), Control Authorities, Administrative Authorities that authorise or certify a product or an activity or an investment; Judicial Authorities, Economic Public Bodies that provide transport, energy, communication and law enforcement services to the community.

Relations with the Public Administration

In relations with the Public Administration, STIGA's conduct is driven by respect for the correctness, honesty and transparency of operations.

In particular, the Recipients must, as far as they are concerned:

- ensure that relations with public officials are managed exclusively by persons with suitable powers and that such relations take place in compliance with the laws, regulations in force, principles of loyalty and correctness;
- carry out the obligations towards the Public Administration with the utmost diligence and professionalism to provide clear, accurate, complete and truthful information, avoiding and reporting situations involving conflict of interest;
- ensure that the documentation to be sent to the Public Administration is produced by persons competent in the matter and previously identified and that it is always first shared with their manager;
- guarantee the confidentiality in the transmission of information;
- use communication channels with the Public Administration that allow the subsequent traceability / formalisation of the information sent and / or received;
- guarantee the legality, correctness and transparency of all relations with Public Officials, Public Service Officers and representatives of Public Administrations in general, taking care to keep track of the documentation exchanged that explains the data and information provided and decisions taken;
- ensure that the procedures relating to the request, issue and maintenance of licenses, authorisations or concessions, as well as relations in general with the authorities that carry out judicial, inspection and regulatory functions, are managed exclusively by those in the relevant roles, and with the necessary competencies, and are based on the principles of legality, transparency, collaboration and fairness;
- report to your manager and the STIGA Group Internal Audit Manager any extortion, or attempt at extortion, by a public official or a person in charge of a public service, or of which they may be recipients or of which they are aware.

No STIGA Recipient may:

- offer, give, pay, accept or promise any gift, money or other advantage or utility to public officials to influence the impartiality of their professional judgment, to improperly promote or favour the interests of STIGA or in any case in violation of applicable laws;
- send false or artfully formulated documents, certify non-existent requirements or give guarantees that do not correspond to the truth;
- unduly procure any other type of profit (e.g., licenses, authorisations, relief from social security charges etc.) by means of artifice or deception;
- undertake economic activities, confer professional duties, give or promise gifts, money or other advantages or benefits – such as, by way of example, hiring or promises of hiring – to Public Officials or public employees involved in administrative proceedings that may entail advantages for STIGA;
- unduly receive contributions, loans, soft loans or other disbursements of the same type in any way named, granted or disbursed by the Public Administration, through the use or presentation of false or misleading documents, or through the omission of due information;
- use contributions, grants or loans intended for the construction of public works or for the performance of activities of public interest, for purposes other than those for which they are granted;
- misrepresent or persuade others to provide false or misleading information to the relevant public authorities.

STIGA promotes, within the limits of its powers, the proper administration of justice, collaboration with the Judicial Authority, the police and any Public Official who has inspection powers and carries out investigations against it.

STIGA requires, in fact, that all staff provide the utmost availability and collaboration with public officials who come to carry out inspections and checks on the work of STIGA.

Selection of third parties for the management of relations with the Public Administration

If STIGA uses a consultant or a third party in relations with the Public Administration, these parties operating in the name of STIGA will be invited to contractually accept compliance with the rules of this Code of Ethics.

In relations with the Public Administration, STIGA must not be represented by third parties who may have a conflict of interest, or potential conflict of interest, or lack the requisite integrity.

Employment relationships with employees or former employees of the Public Administration

Any employment relationship with employees or former employees of the Public Administration, who in the exercise of their functions have / have had relationships with STIGA or their relatives and / or similar, takes place in strict compliance with the procedures defined by STIGA for the selection of personnel and its collaborators, without the candidate's current / previous qualifications influencing the final decision regarding their potential employment.

Grants, authorisations and donations

STIGA guarantees the correctness and completeness of the documentation prepared to obtain contributions, subsidies, loans, authorisations and concessions from the Public Administration (e.g., European Community, State, Local Authorities etc.) and that what is obtained is used for the purposes for which it has been requested and granted.

Any donations made to local entities or other entities attributable to the Public Administration must be made in compliance with the principles contained in this Code of Ethics, subject to prior communication and authorisation of the same to the Head of Group Internal Audit.

5-5 Shareholders, members and financiers

Entrepreneurial risk is protected through a prudent, non-speculative policy that is careful to safeguard the solidity of STIGA, while at the same time aiming to promote economic competitiveness, efficiency and operational effectiveness.

STIGA observes high standards of corporate governance to protect its value and reputation in the interests of shareholders and all stakeholders.

STIGA adopts a Corporate Governance system compliant with current provisions, as well as with national and international best practices on the subject. This Corporate Governance defines the principles of good management to increase the reliability of STIGA GROUP, to protect all its members, shareholders and other interested parties.

STIGA also promotes behaviour by the Directors of the STIGA GROUP companies to protect the integrity of corporate assets and protect their creditors in accordance with the legislation in force.

STIGA ensures the full transparency of the choices made and aims to develop and maintain a constructive dialogue with partners, shareholders and lenders. Therefore, in accordance with the procedures defined at company level, it promptly provides partners, shareholders and lenders with all the information that may influence the investment decision, so that it is possible to make fully informed choices.

STIGA avoids preferential behaviour towards shareholders by guaranteeing fairness, clarity and equal access to information for all, to avoid the misuse of the information. Furthermore, in the face of loans received, STIGA honours commitments made with the lending institutions, punctually respecting agreed deadlines.

5.6 Intra-group transactions

All inter-company transactions are managed in full compliance with the regulations in force, as well as in compliance with the principles set out in this Code of Ethics.

STIGA carries out intra-group transactions under market conditions, respecting the transparency, correctness, effectiveness and traceability of the underlying economic relationships and the related financial flows. Therefore, the fees relating to exchange of services and / or goods between STIGA GROUP associated / subsidiary companies are defined according to pre-established conditions and governed by company policy and must always be justifiable.

5.7 The community

This section applies to those stakeholders whose interests are influenced by the direct and indirect effects of STIGA's activities.

Support for social and cultural initiatives: relationships with institutions and other organisations

STIGA, with a view to improving the social context in which it operates, expresses its commitment to sensitive and relevant topics for the community (e.g., social, moral, scientific, cultural, beneficial or solidarity) that can contribute to its growth and development and promote collaborative relationships with local institutions.

Relations with institutions are based on the utmost rigour, transparency and fairness in compliance with institutional roles.

STIGA rejects any relationship with national or foreign organisations, associations or movements that pursue, directly or indirectly, purposes prohibited by law, contrary to ethics or public order, or that violate the fundamental rights of a person.

In the event of support for social and cultural initiatives, STIGA takes into consideration initiatives consistent with its strategic objectives and the principles of environmental and social responsibility.

Sponsorships or charitable contributions

In the case of sponsorship, charitable contributions or other forms of donation, STIGA selects initiatives that offer a guarantee of quality and that represent the appropriate ethical aim of social development.

In evaluating options, each company of the STIGA GROUP must verify that there are no potential conflicts of interest of either an individual or corporate nature.

Political parties and trade union organisations

STIGA does not finance political parties, trade unions, their representatives or candidates, nor does it pay them contributions of any kind, directly or indirectly, except for contributions due because of specific legal provisions.

The Company approaches relationships with trade unions in a responsible and constructive manner, fostering a climate of mutual trust and healthy dialogue, with the continuing aim of profitable, informed and effective communications between the parties. Workers have the right to freely associate, to join trade unions or not, to seek representation and to join workers' councils in accordance with local laws.

Communication to the outside

The external communication of data or information, when carried out, must be truthful, transparent, adequate, appropriate and consistent with the policies of STIGA, and only handled by the job roles assigned to it. Recipients must therefore refrain from behaving in any way, or making statements, that could harm the image or interests of STIGA.

Environmental protection

STIGA GROUP is aware of the influence, even indirectly, that its activities may have on the environmental conditions of the territories in which it operates.

For this reason, without prejudice to compliance with the specific legislation applicable in each country, STIGA GROUP adopts appropriate measures to preserve the environment and the community, promoting the development of activities in line with this objective and taking action to raise awareness.

The assumption of STIGA's environmental policy is expressed by the belief that the environment is a common good to be protected.

STIGA therefore undertakes to raise the awareness of its employees and collaborators so that they are aware of the environmental aspects and impacts associated with its activities and aim to reduce such effects of their actions, in compliance with the provisions of company procedures.

To achieve the aforementioned objectives, STIGA is committed to: the use of processes, technologies and materials that allow a reduction in the consumption of natural resources and that have the lowest environmental impact; the limitation of waste production through, where possible, their reuse; the involvement and motivation of all staff, through information and training actions, regarding environmental issues.

STIGA carries out its activities within the limits of permits, licenses and public authorisations, being aware of potentially polluting raw materials or final products and ensuring due attention to the safety of their transport, transit, storage and disposal.

6. Implementation of and compliance with the code of ethics

6.1 Approval of and amendments to the Code of Ethics

This Code of Ethics is approved by resolution of the Board of Directors of Stiga S.p.A. and received by each company of the STIGA GROUP with an act of its administrative body.

Any changes and / or updates take place in the same form

6.2 Dissemination and training

Each STIGA GROUP company distributes the Code of Ethics to its Recipients in the manner deemed most suitable for effective disclosure (e.g., by delivering the document to customers, suppliers and new hires and by signing, where possible, a specific form that certifies its receipt, or by the inclusion in contracts of a clause that commits counterparties to respect the contents of the Code of Ethics).

In any case, the Code of Ethics is brought to the attention of employees and collaborators, as well as all other Recipients, by the publication of the document on the website of each company in the Group and on the corporate website of the STIGA GROUP.

6.3 Reporting of violations of the Code of Ethics

STIGA has identified the Group Internal Audit as the guarantor of compliance and correct implementation of the Values, Principles and Rules of conduct set out in this Code of Ethics.

The Head of Group Internal Audit carries out the following tasks:

- discusses with those in relevant job roles how to ensure adequate communication and / or training paths;
- clarifies any questions around the interpretation of situations of "ethical dilemma";
- collects reports of alleged violations of the Code of Ethics;
- guarantees the confidentiality of the identity of the whistle-blower in the context of investigations, protecting them from any forms of retaliation or discrimination;
- reports the violations to the person with disciplinary power for applying relevant sanctions.

Communications to the Head of Group Internal Audit (such as the report of an alleged violation, the request for clarification or an opinion etc.) must be sent in writing, even anonymously, through:

- the e-mail address internalaudit@stiga.com;
- ordinary mail to the address of the headquarters of Stiga S.p.A., addressed to the Group Internal Audit (to ensure confidentiality, the report must be placed in a sealed envelope that bears the wording "confidential / personal" on the outside).

The Head of Group Internal Audit immediately reports to the competent Vice President, to the HR Senior Vice President as well as to the Supervisory Body of Stiga S.p.A., appointed pursuant to and for the purpose of Legislative Decree 231 of 2001, any alleged violation which concerns the Group's activities carried out in all Group companies.

6.4 Sanction system

Each company of the STIGA GROUP undertakes to prepare and implement those organizational verification and monitoring measures aimed at guaranteeing compliance with the Code of Ethics in all actions, operations and negotiations carried out by the Recipients, both in the performance of work, and in the activities carried out by third parties on behalf of STIGA GROUP, providing for sanctions in case of violation of the same.

Violations of the Code of Ethics by personnel are to be considered a non-fulfilment of the obligations of the employment relationship and / or disciplinary offense, with all legal consequences regarding the imposition of disciplinary sanctions, up to the termination of the employment relationship with consequent compensation of the resulting damages.

Compliance with the provisions of this Code of Ethics, formalised in the contractual agreements or in the general contract conditions through the insertion of a specific clause, constitutes an essential part of the obligations of third parties (suppliers, experts, commercial partners etc.) involved in commercial relationships with STIGA GROUP. Consequently, any violation of these principles in the context of the activities rendered by third parties to STIGA may constitute a cause of breach of contract with all legal consequences.

In any case, each company of the STIGA GROUP is entrusted with the definition of its own system of sanctions to be applied in the event of violations of this Code of Ethics, in compliance with the applicable local legislation.