

CODE OF ETHICS

La Bottega S.p.A.

1. INTRODUCTION

1.1 Adoption of the Code of Ethics

La Bottega S.p.A. (hereinafter referred to as the “Company”) operates in the production and marketing, both wholesale and retail, directly and on behalf of third parties, in Italy and abroad, of products intended for hotels, airlines, spas, restaurants, hospitals and communities in general.

The Company intends to establish general ethical and behavioural principles to guide its activities, fostering a virtuous organisational culture.

The Board of Directors therefore approved this Code of Ethics by resolution dated 5 February 2025, together with the Organisational Model pursuant to Legislative Decree no. 231/2001 (hereinafter, the “Organisational Model”), of which this Code constitutes an annex and an integral part.

This Code of Ethics reflects the values that must inspire all conduct and whose observance is essential. The Company undertakes to ensure that this Code of Ethics is regarded as a standard of best practice for business conduct by all parties with whom it maintains relationships.

Any violation of the rules and principles set out in this Code of Ethics, even where it does not result in direct liability for the Company towards third parties, entails personal responsibility on the part of the individual who committed the violation towards La Bottega S.p.A.

The Company monitors compliance with this Code, implements appropriate information, prevention and control tools, and ensures transparency in its operations and conduct.



GUEST EXPERIENCE CURATORS

1.2 Recipients

The rules set out in this Code of Ethics apply to all Recipients, including members of the Board of Directors, members of the Board of Statutory Auditors, employees, attorneys, collaborators, consultants, commercial partners, suppliers, agents and all persons who, even occasionally, operate in the name, on behalf of or in the interest of the Company, whether individuals or legal entities, including those belonging to the same Group.

Recipients are therefore required to be familiar with the contents of this Code of Ethics, to comply with them and to contribute to their implementation by reporting any shortcomings, violations or attempted violations of which they become aware.

The Company actively encourages the participation of all Recipients in ensuring compliance with, dissemination and implementation of the Code of Ethics.

2. GENERAL PRINCIPLES

2.1 Premise

This Code of Ethics defines the values to which La Bottega must adhere.

The ethical and behavioural principles set out herein have primary and absolute value. Therefore, the belief that one is acting in the interest or to the advantage of the Company does not justify conduct that is contrary to such principles.

The ethical principles guiding La Bottega and shaping its behavioural standards are full compliance with the law, transparency and fairness in management.

The objective is to compete fairly and effectively in the market, improve customer satisfaction, increase shareholder value and promote the professional development and skills of human resources.

Compliance with this Code of Ethics constitutes a contractual obligation for all Recipients within the context of any employment, collaboration or appointment, regardless of its nature.



GUEST EXPERIENCE CURATORS

2.2 Principle of legality

The Company requires all persons acting in its name and on its behalf to comply with national and local legislation, EU regulations, regulatory provisions, administrative acts of local authorities and, in general, all applicable laws and regulations.

Lack of knowledge of the aforementioned legal sources does not exempt Recipients from responsibility.

2.3 Principle of transparency and integrity

Transparency is based on the truthfulness, accuracy and completeness of documentation and information.

The Company ensures a continuous, timely and complete flow of information, with the aim of guaranteeing clear and transparent communication towards all individuals and counterparties involved in corporate processes.

Under no circumstances is it permitted to disclose false or misleading information or comments.

Furthermore, La Bottega is committed to promoting an internal culture that, at all levels, values awareness of controls and actively supports their implementation.

The Company expressly prohibits practices and behaviours aimed at committing fraud or circumventing internal controls.

2.4 Traceability of operations and transactions

The corporate system must ensure that every activity is properly and promptly recorded, in accordance with legal requirements, accounting principles and internal procedures and/or practices, so as to allow proper document archiving, subsequent verification of the operation and identification of the individuals who authorised, carried out, verified and recorded it.



GUEST EXPERIENCE CURATORS

2.5 Loyalty, trust and fidelity

The Company and all Recipients of this Code of Ethics cooperate in a relationship based on mutual loyalty, trust and fidelity.

Accordingly, it is expressly prohibited to engage in activities that are contrary to the interests of the Company or incompatible with official duties, even where no actual conflict of interest arises as defined in Section 2.6 of this Code.

2.6 Conflict of interest

Decisions and business choices made on behalf of the Company must be aligned with its best interest. Therefore, all Recipients of this Code of Ethics must avoid any situation of conflict of interest, including personal or family-related interests, that could compromise independent judgment.

A conflict of interest is understood as any situation that may interfere with the ability to make impartial decisions in the interest of the Company.

Any action or situation that may give rise to a potential conflict of interest must be promptly reported to the relevant line manager, together with an obligation to refrain from acting.

2.7 Confidentiality obligation

All Recipients of this Code of Ethics are required to keep confidential any technical, technological and commercial information, as well as any other non-public information relating to the Company.

The obligation of confidentiality remains in force even after termination of the employment relationship.

2.8 Protection of privacy

Recipients of this Code of Ethics undertake to process personal data and confidential information acquired in the course of their activities in compliance with applicable laws.

The Company considers the protection of confidentiality regarding corporate matters to be an essential prerequisite for any commercial relationship.



GUEST EXPERIENCE CURATORS

The Company ensures the confidentiality of the information in its possession and uses it in compliance with applicable regulations, refraining from seeking confidential data through unlawful means.

The Company undertakes to process personal data lawfully, fairly, accurately and appropriately, safeguarding the rights of data subjects and implementing specific measures to inform employees and collaborators entrusted with data processing of correct data management practices.

All Recipients are required not to use or disclose confidential information for purposes unrelated to the performance of their professional duties.

To this end, the Company adopts high security standards in the selection and use of its IT systems for the processing of personal data and confidential information.

IT systems must be used in compliance with Company security and confidentiality policies, avoiding the acquisition, use or transmission of information or content unrelated to work activities and refraining from altering Company hardware or software configurations.

2.9 Prevention of public and private corruption

The Company does not tolerate any form of corrupt conduct towards public or private entities.

Accordingly, all Recipients of this Code of Ethics are prohibited from offering gifts, benefits or other advantages that may constitute a violation of laws or regulations, or an attempt to improperly influence the actions of third parties.

Likewise, Recipients are prohibited from accepting or soliciting, directly or indirectly, sums of money or other benefits.

2.10 Protection of health, workplace safety and the environment

The Company aims to ensure effective management of workplace health and safety, as well as environmental protection, which it considers essential to its success.

To this end, the Company undertakes to:



GUEST EXPERIENCE CURATORS

- protect the health and safety of its employees in the workplace and adopt and maintain appropriate management systems to identify and prevent potential risk situations;
- operate in full compliance with applicable environmental protection regulations.

In matters of occupational health and safety, decisions at all levels are made and implemented based on the following principles:

- elimination of avoidable risks;
- assessment and mitigation of unavoidable risks;
- addressing risks at their source;
- adapting work to individuals to reduce health impacts;
- taking into account technological advancements;
- replacing hazardous elements with non-hazardous or less hazardous alternatives;
- implementing systems integrating technology, work organisation, social relations and workplace environmental factors;
- prioritising collective safety measures over individual protection;
- providing appropriate instructions to workers.

2.11 *Accounting and tax obligations*

The Company operates with maximum transparency in administrative and accounting matters, ensuring the truthfulness, accuracy and completeness of information relating to all accounting records and ensuring that management facts are represented correctly and faithfully.

In particular, each accounting transaction:

- must be duly authorised and documented to ensure its verifiability, legitimacy and consistency;
- must be properly recorded and accounted for in accordance with best current practices and adequately documented to ensure traceability.

Financial statements are prepared in compliance with applicable regulations and in accordance with the Italian Civil Code, OIC Accounting Standards and interpretations and guidance issued by the National Council of Chartered Accountants and Accounting Experts.

The Company fulfils all tax obligations correctly and in a timely manner.



GUEST EXPERIENCE CURATORS

2.12 *Anti-money laundering obligations*

The Company complies with all national and international regulations on the prevention of money laundering and requires all Recipients of this Code of Ethics to refrain from any transaction that may involve the use or re-use of proceeds derived from unlawful activities.

It is prohibited to accept or execute payment orders originating from or directed to unidentified parties or using methods that prevent or hinder traceability.

The use of cash or bearer financial instruments is prohibited, except as permitted by law and Company policies and, in any case, only for very limited amounts.

3. INTERNAL POLICIES AND FUNCTIONS

3.1. *Human Resources*

The Company condemns any conduct aimed at committing crimes against individual dignity and considers the protection of personal freedom and dignity as fundamental values.

The Company promotes professional development and collaboration among colleagues at all levels. Relationships with employees, collaborators and corporate bodies are based on mutual respect.

The Company guarantees equal opportunities for professional growth without discrimination based on gender, age, disability, religion, nationality, racial origin, political or trade union opinions. The Company undertakes to provide a suitable and functional working environment.

All human resources decisions are made based on merit and competence, without favouritism. In hierarchical relationships, authority is exercised fairly and appropriately, avoiding any abuse.

No performance, personal favour, act or conduct that may constitute a violation of laws, regulations, the Organisational Model or this Code of Ethics is owed to a superior.

All Recipients are required to act properly and respectfully towards colleagues, subordinates, collaborators, partners, suppliers and customers.

The employment of foreign workers without valid residence permits is prohibited.



GUEST EXPERIENCE CURATORS

3.2. *Relations with control bodies (internal and external)*

Relations with entities responsible for control, audit and review activities must be conducted with fairness and transparency.

It is prohibited to conceal information, provide false documentation or otherwise hinder or obstruct control activities.

4. RELATIONS WITH EXTERNAL PARTIES

4.1 *Relations with customers*

The Company recognises that customer satisfaction is essential to its success and therefore undertakes to:

- comply with internal procedures in managing customer relationships;
- provide high-quality products that comply with contractual requirements and meet or exceed legitimate customer expectations, ensuring efficiency and courtesy;
- provide clear, accurate and comprehensive product information to enable informed decision-making;
- disseminate truthful information in all advertising and promotional communications, avoiding any misleading conduct.

4.2 *Relations with suppliers, partners and agents*

Relations with suppliers, commercial partners and agents must be conducted with fairness, transparency and impartiality.

During commercial negotiations, Recipients must act with integrity, transparency and fairness.

Suppliers, partners and agents are required to maintain conduct based on fairness, professional integrity and compliance with applicable laws. The Company shares the principles of this Code of Ethics with them to ensure compliance and to safeguard its reputation.



GUEST EXPERIENCE CURATORS

4.3 Relations with third parties

Without prejudice to Section 2.9 regarding corruption prevention, relations with third parties, whether public or private (Public Authorities, financial institutions, sponsors, etc.), must be conducted with the utmost fairness and transparency.

In particular, it is prohibited to:

- exert unlawful pressure;
- provide false or misleading statements;
- allocate funds, financing, contributions or donations received to purposes other than those for which they were granted.

The Company does not accept donations from entities that do not respect human rights, workers' rights or environmentally responsible practices.

Institutional interactions are reserved exclusively for individuals who are specifically identified, expressly delegated or authorised, and who must act in compliance with applicable laws, this Code of Ethics, the Organisational Model and Company and/or industry practices.

In general, all Recipients are prohibited from engaging in actions that may:

- deceive institutional counterparties to obtain unlawful advantages to the detriment of the State or other public entities;
- operate outside the law and good commercial practices in activities aimed, inter alia, at obtaining concessions, licences or public funding, contributions or grants;
- submit or provide false, misleading or unverifiable documents or information, or omit required information;
- interfere with IT or telematic systems by tampering with data to obtain unlawful advantages;
- induce third parties, in any manner, to provide false statements to judicial authorities.



GUEST EXPERIENCE CURATORS

5. VIOLATIONS OF THE CODE OF ETHICS AND SANCTIONING SYSTEM

5.1 Reporting violations

The Company ensures a working environment in which reports of violations of laws, this Code of Ethics or the Organisational Model are handled with the utmost seriousness and without fear of retaliation.

Reports are managed in accordance with the procedures set out in the Organisational Model, to which full reference is made.

5.2 Sanctions

Compliance with the Code of Ethics is an integral part of the contractual obligations of all persons collaborating with the Company.

Any violation of the Code therefore constitutes a breach of primary contractual duties or a disciplinary offence and may result in disciplinary measures, in accordance with the Workers' Statute, applicable National Collective Labour Agreements and the Disciplinary System set out in the Organisational Model, to which full reference is made.



GUEST EXPERIENCE CURATORS