

CODE OF ETHICS

Constitutive element of the
Organization, Management
and Control Model pursuant
to Legislative Decree
231/2001

DELTA CONTRACT S.P.A.
13/23 FORNACE CAVALLINO STREET
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Summary

Corporate Mission & Vision: our values	5
Code of Ethics and Model 231	5
The Recipients	6
Principles and rules of conduct	7
Protection of human rights	7
Compliance with laws, procedures, and regulations	7
Transparency, fairness, integrity	8
Business activity, protection of competition and the market	8
Business relations	9
Transparency of corporate documents and business continuity	9
Stakeholder relations	10
Customer relations	10
Supplier relationships	11
Relations with Public Administration	11
Relations with law enforcement and judicial authorities	12
Relations with certification bodies	12
Relations with political, trade union and social organizations	12
Gifts, gratuities and representation expenses	13
Centrality of human resources	13
Occupational health and safety	13
Valorization and protection of personnel	14
Personnel selection and management	14
Prohibition of discriminatory conduct	15
Equal opportunities and gender equality	15
Use of company assets	16
Know-how, intellectual property, including that of third parties	16
Protection of competition and the market	17
Confidentiality of personal data	17
Environment and sustainability	18
Conflict of interest	19
Final provisions	19

Supervision of the application of the Code of Ethics	19
Suggests any modifications, updates, and additions.	20
Reporting channels	20
Whistleblowing	20
Compliance with the Code of Ethics, Sanctioning system	20
Adoption and amendments to the Code of Ethics	21
Communication and dissemination of the Code of Ethics	21
Conclusions	21

Corporate Mission & Vision: our values

Delta Contract S.p.A. (hereinafter, also, “Delta Contract” or “Company”) was born from the desire of its shareholders and collaborators to offer the market all the experience gained over years of work in the “lighting” world.

In particular, Delta Contract is the original core of Delta Group, operating in the world of Bespoke lighting and present, for over 35 years, in the various Italian and international lighting markets, specializing in lighting fixtures for cruise ships, public and private contract, casinos, hotels, retail, and offices.

Strengthened by many years of experience in the sector, Delta Contract pays the utmost attention to every detail, with a keen sensitivity for anticipating trends.

Delta Contract is inspired by the past and reinterprets the Mediterranean wealth of seafaring tools in a modern key, to guarantee prestigious supplies. The products used by the Company are born from a long and careful preparatory phase, resulting from an analysis of the client's requests, close collaboration with designers, and their support from the very first transcription of ideas.

Delta Contract's work stands out for its distinct and strong characteristics, such as: design orientation, production capacity, reliability and speed of execution, and the guarantee of traditional yet high-tech solutions.

The document you are reading (“Code” or “Code of Ethics”) intends to recognize and highlight the foundational values of the credibility already acquired by the Company in the market, also with a view to reaffirming the roots that inspire the daily conduct of all Delta Contract S.p.A. personnel.

These are binding principles, which include, but are not limited to, compliance with applicable laws and regulations, and concern – more broadly – fairness, transparency, and integrity in the management of company business.

Code of Ethics and Model 231

Specialization, competence, speed and innovation, together with constant attention to customer needs, are key points of the identity of Delta Contract S.p.A.: they guide the company's actions in every significant choice.

Through the adoption and dissemination of this Code of Ethics, the Company intends to further clarify and strengthen the operational effectiveness of such distinctive features, setting them out as relevant principles and rules of conduct, both internally and in relations with third parties.

Today more than ever, Delta Contract S.p.A., therefore, believes in and invests with conviction in an ethic based on respect for high-quality standards and the promotion of its corporate values, for the protection of internal and external stakeholders.

In this perspective, the Company has decided to adopt an Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001 (hereinafter, “Model 231” or “Model”), instrumental to the mitigation of the risk of committing crimes.

The Code of Ethics, as the ‘constitutional charter’ of corporate life, is an integral part of the 231 Model, representing the basis of inspiration and an interpretive tool for all the safeguards provided by the Model itself.

To ensure the concrete implementation of the corporate ethical vision, the principles and rules contained in this Code of Ethics assume a binding character, to be understood as the duty of every Recipient (see below) to respect the indicated standards of behavior.

In order to monitor compliance with the Code of Ethics and, more broadly, with the Model 231, Delta Contract S.p.A. makes use of the support of a Supervisory Body, which operates within the limits and with the functions provided for by art. 6 paragraph 1 letter b) of Legislative Decree no. 231/2001.

The Recipients

The principles and rules contained in this Code of Ethics apply to the following Recipients:

- Corporate bodies;
- Company personnel with representation, administration, and management functions;
- Employees and Collaborators;
- Suppliers;
- Customers;
- Consultants and business partners;
- in general, all those who maintain direct and indirect relationships with the Company.

The Recipients of the Code of Ethics, as identified above, must adopt behaviors consistent with the principles and values of Delta Contract S.p.A.

The Administrative Body of Delta Contract S.p.A. and every head of the company's corporate functions are required to comply with the standards and corporate culture outlined in the Code of Ethics, promoting their assimilation throughout the entire company context. This starts from the activity of defining objectives and promoting corporate investments, as well as from the choice of

commercial partners, in the concrete realization of projects, and in the management of personnel. In general, these principles represent a fundamental reference in the making of any management decision of the Company.

Likewise, employees are bound by what is defined in this Code of Ethics; the latter must, in particular, conform both the relationships occurring within the Company – thus strengthening cohesion and the spirit of mutual collaboration – and the relationships with third parties who come into contact with the Company (first and foremost, the clientele).

In order to promote compliance with the Code of Ethics and - in general - the ethical-organizational awareness of the Company, Delta Contract S.p.A. provides for the maximum dissemination of this document, through publication on the website, on company notice boards, as well as through the carrying out of training and awareness activities.

The Code of Ethics is also brought to the attention of the Company's collaborators, business partners, and anyone who has business dealings, at any level, with Delta Contract S.p.A.

Principles and rules of conduct

Protection of human rights

The Company respects and promotes human rights and fundamental freedoms, in the firm conviction that such principles represent essential factors for an authentic and sustainable development.

The Company supports, in particular, within its sphere of operation and influence, the protection of the fundamental rights enshrined in the Universal Declaration of Human Rights (UN).

Compliance with laws, procedures, and regulations

Delta Contract S.p.A. operates by scrupulously adhering to the principle of legality, in compliance with the values of the democratic order. Therefore, all Recipients are required to respect the principles and norms of the Constitution and the laws of the Italian Republic, the regulations and directives of the European Union, acts having the force of law (decree-laws and legislative decrees) and national regulations, as well as every internal policy and self-regulation act, including this Code of Ethics.

In this perspective, the Company collaborates in the prevention of acts contrary to the standards outlined above, committing itself not to provide any form of financing, direct or indirect, and not to favor, in any way, groups, associations, or individuals that pursue illicit purposes or are otherwise not aligned with the values promoted by this Code of Ethics.

Transparency, fairness, integrity

Transparency, fairness, and integrity are fundamental principles that inspire the entire organization and every operational expression of Delta Contract S.p.A. The Recipients recognize them as essential standards for their conduct, both internally and in dealings with third parties.

All conduct engaged in by the Recipients of this Code of Ethics, having both internal and external relevance to the Company, must conform to the highest standards of professional rigor, fairness, transparency, and fair competition, and any activity engaged in by top management, employees, and collaborators in business relationships with third parties must respect the rules of fairness and good faith derivable from articles 1175 and 1375 of the Civil Code.

All actions and operations must be duly authorized and correctly recorded, as well as verifiable, legitimate, and adequately documented, in order to allow for the verification of the related decision-making process at any time.

Delta Contract S.p.A. reaffirms its conviction that acting for the benefit or in the interest of the organization does not in any way justify the adoption of conduct that does not comply with the principles contained in this Code of Ethics.

Fight against corruption

Delta Contract S.p.A. rejects any form of corruption and, aware that this phenomenon poses a series of social, economic, and political problems, constantly fights against this insidious phenomenon.

The Company, in line with its guiding principles, undertakes not to offer or promise money, gifts, or other benefits, with the aim, even if implicit, of acquiring preferential treatment or an improper advantage over other companies.

Business activity, protection of competition and the market

Delta Contract S.p.A. carries out its business with the goal of achieving levels of profitability and quality of services offered to its clients in order to preserve and increase its value. Delta Contract S.p.A. also carries out its business by recognizing and protecting competition as a stimulus for growth and improvement of the market, as well as of its own business.

Therefore, Delta Contract S.p.A. bases the conduct of its business on the principles of transparent, fair and loyal competition, requiring all its employees to refrain from collusive behavior and from participating in operations that may lead to violations of the rules protecting competition in the market.

Business relations

Delta Contract S.p.A., in the conduct of its business relations, is inspired by the principles of legality, loyalty, and fairness, as well as the principles identified in this Code of Ethics.

It is strictly forbidden to use funds or assets of Delta Contract S.p.A. for illicit purposes or to influence others through the giving of sums of money. It is also forbidden to carry out operations aimed at the misappropriation of financial resources and the creation of hidden reserves.

Antitrust and anti-money laundering law

Delta Contract S.p.A. scrupulously observes the current anti-money laundering legislation and therefore maintains business relationships with reputable clients who carry out legitimate activities and whose funds come solely from lawful transactions.

Delta Contract maintains only relationships that are in line with the principles of fair competition and applicable anti-trust regulations, also avoiding agreements or actions such as collusive bidding, price fixing and discrimination, or other unfair trade practices that illegally limit market trade or free competition.

The Company repudiates any activity that could be interpreted as connected to money laundering, and complies with current anti-money laundering legislation.

Transparency of corporate documents and business continuity

The Company adopts, as fundamental values, the principles of transparency, honesty, accuracy, truthfulness, and completeness of any corporate document in which economic, equity and/or financial elements are set out, in compliance with current regulations. Consequently, the company resources involved in the activities preparatory to the preparation of financial statements and corporate communications undertake to perform their duties in compliance with the aforementioned principles.

The Company therefore condemns any conduct aimed at altering the transparency, fairness, and truthfulness of the data and information contained in financial statements, reports, or other corporate communications required by law, addressed to the public, shareholders, or the Board of Statutory Auditors. Therefore, in the event of a request for accounting information from shareholders, the supervisory body, or the Supervisory Board, in the exercise of their respective institutional functions, the personnel involved are required to respond promptly, completely, accurately, and transparently. In this regard, it is also specified that the Company complies with current tax legislation in order to ensure the correct determination and settlement of taxes and is committed to timely fulfilling all tax obligations provided for by law, also in accordance with the practices of the Revenue Agency.

The Company also strives, at an organizational level, to identify and prevent operational, financial, or other types of risks that may undermine business continuity. Therefore, it is necessary that accounting records and the documents derived from them be based on genuine and exhaustive information and must also be accompanied by appropriate supporting documentation, easily retrievable, necessary for carrying out checks and verifications. To this end, and with particular reference to financial flows, the Company's incoming and outgoing payments must always be authorized, as well as tracked and recorded. More broadly, all actions and operations must be duly authorized and correctly recorded, and must be verifiable, legitimate, consistent, and adequately documented in order to allow, at any time, the verification of the relative decision-making, authorization, and implementation process.

Any omission or misrepresentation of which employees become aware must be, without delay, reported to the Supervisory Body.

In the spirit of Art. 2086, paragraph 2 of the Italian Civil Code, the Company undertakes to adopt an organizational, administrative, and accounting structure adequate to the nature and size of the enterprise, also for the purpose of the timely detection of the enterprise's crisis and the loss of business continuity.

Stakeholder relations

Delta Contract S.p.A. is committed to promoting and maintaining a relationship of trust with all its stakeholders, whether they be employees, customers, suppliers, groups, institutions, or other organizations whose interests may be directly or indirectly affected by the company's activities. This commitment is a fundamental element for the pursuit of the Company's mission.

Customer relations

Delta Contract S.p.A. is committed to satisfying its customers by respecting high qualitative and technological standards, conducting relationships with high professionalism, availability, and fairness. Delta Contract S.p.A. is strongly customer-oriented and is recognized by the market for its ability to provide technical and comprehensive support to companies in the design and development of 2D technical drawings, 3D models, plant layouts, and mechanical calculations.

Specifically, in the context of relationships with Clients and, in general, with all Recipients, Delta Contract S.p.A. develops and maintains positive and lasting relationships, inspired by standards of collaboration and courtesy, transparency and integrity, with a view to qualifying the Company as a safe and reliable partner. This is done, in particular, by providing accurate, complete, truthful, and timely information to enable the Client to make an informed decision, as well as by fulfilling all commitments undertaken.

The personnel of Delta Contract S.p.A. is, furthermore, required to ask Clients to observe the Company's deontological principles, respecting the provisions of this Code of Ethics.

Supplier relationships

Delta Contract S.p.A., in the conduct of its business and in its relations with suppliers, adheres to the principles of loyalty, impartiality, professionalism, and honesty.

The Company's suppliers must ensure that their personnel have working conditions based on the respect for human rights, international conventions, and applicable laws.

The Company's suppliers are required to fully comply with legality and commercial fairness, with particular reference to regulations on free competition and the market, the protection of intellectual property, and laws combating money laundering and organized crime.

Delta Contract S.p.A. requires its suppliers to comply with this Code of Ethics, laws, and collective labor agreements, as well as to refrain from using undeclared labor.

Should any behavior by a supplier that is inconsistent with these standards emerge, Delta Contract S.p.A. reserves the right to take any measure it deems appropriate, including the termination of any relationship between said supplier and the Company itself.

In adherence to the principle of integrity, in relations with suppliers, any giving and receiving of gifts/favors that could be interpreted as exceeding ordinary commercial courtesy practices or that is in any case implicitly aimed at unduly acquiring preferential treatment for oneself or for the Company is prohibited.

Relations with Public Administration

All relations with the Public Administration are inspired by the strictest compliance with current legal provisions and company procedures, in accordance with the principles of legality, fairness, loyalty, and transparency. For the purposes of this Code of Ethics, Public Administration shall mean any public body or its representative, a natural person acting in the capacity of a public official or person in charge of a public service.

The Company's relationships with individuals representing the Public Administration are managed solely by duly authorized persons, within the limits of their role and according to the powers provided for by the bylaws.

In the conduct of such relationships, the Recipients of this Code must absolutely avoid conduct that could be interpreted, even if only, as being of a collusive nature, or in any case capable of undermining the principles listed above (by way of example, the offer – even if indirect – of money or benefits of any kind).

In the event of attempted extortion by a public official, the Recipients are required not to comply with the request and to promptly inform their manager and the Supervisory Body.

Relations with law enforcement and judicial authorities

Delta Contract S.p.A. ensures and promotes conduct based on the principles of fairness, transparency, and cooperation with police, security, and judicial bodies and with the Judicial Authorities.

In case of control procedures or inspection activities by public bodies/authorities, the personnel involved undertakes to carry out the instructions given and to notify their hierarchical superior without delay. The Company prohibits any type of conduct that may influence the outcome of ongoing legal proceedings.

It is forbidden to engage in any form of conditioning towards anyone (employee, collaborator, or third party) who is called to give statements before the Judicial Authority.

In case of attempted extortion by a public official, the Recipients are required not to comply with the request and to promptly inform their supervisor and the Supervisory Body.

In any case, any gifts of modest value, acts of courtesy and hospitality that do not compromise the reputation of either party must be authorized in advance.

Relations with certification bodies

The relationships with the Certification Bodies must be developed in accordance with the principles of transparency and loyal collaboration.

In the event of inspections, the personnel of Delta Contract S.p.A. are required to cooperate, while respecting mutual roles. Any conduct aimed, even indirectly, at influencing auditing and evaluation activities is prohibited.

Relations with political, trade union and social organizations

Relations with political and trade union organizations are managed by Delta Contract S.p.A., in accordance with the principles set out in this Code of Ethics.

Any involvement of collaborators, suppliers, or third parties in political activities takes place at their own expense and in compliance with the law and may in no way interfere with the Company's actions, which maintains its neutral, apolitical, and non-partisan position.

Gifts, gratuities and representation expenses

Delta Contract S.p.A. recognizes the value of courtesy in respecting professionalism and commercial fairness.

With this in mind, the Company rejects any action aimed at receiving and/or giving gifts, gratuities, and benefits that could be interpreted as instruments designed to improperly obtain advantages and/or aimed at acquiring favorable treatment in the conduct of any business activity.

It is not allowed to offer or receive gifts of high economic value in cash or through the use of other equivalent means.

In any case, in case of doubt regarding the possibility of accepting or not and/or offering a gift, the value of which could be interpreted as non-symbolic, the employee is required to inform - without delay - their manager.

Centrality of human resources

Occupational health and safety

Delta Contract S.p.A. considers human resources as the most important company asset and, consequently, is committed to creating and maintaining safe work environments for every employee.

Specifically, the Company operates in strict compliance with current accident prevention regulations, adopting safety management systems oriented towards prevention that allow for the construction - at every corporate level - of a strong culture of workplace safety. To this end, the Company provides its employees with adequate training and information with the primary purpose of enabling them to work in healthy and safe conditions and to spread the relevant culture.

Delta Contract S.p.A. recognizes, as a strategic company objective, the continuous improvement of operational procedures, environments, and working conditions of its personnel.

Each Recipient of this Code of Ethics is called upon to contribute personally to the protection of health and safety, both their own and that of other persons present in the workplace. This is done, first and foremost, by committing, with awareness and a sense of responsibility, to compliance with

the internal regulations and procedures adopted in this regard, primarily in implementation of Legislative Decree 81/2008.

Valorization and protection of personnel

The Company offers its personnel training and growth opportunities, valuing and protecting individual human and professional characteristics, aware of the primary strategic importance that human resources hold, with the aim of improving the individual and corporate base of competencies.

From this perspective, Delta Contract S.p.A. promotes a comfortable, positive, and rewarding work environment, based on the principles of respect, dialogue, understanding, and mutual collaboration, condemning any form of abuse in relationships between workers. Delta Contract S.p.A. considers any form of abuse or discriminatory behavior related to race or gender, which has the purpose of violating the dignity of the person, to be absolutely unacceptable.

At the same time, the Company is committed to creating a work environment that fosters diversity and protects the psycho-physical well-being of its employees. To this end, among other things, the Company promotes corporate policies that encourage equal opportunities throughout the entire work path of the employee, starting from the recruitment process, and continuing through HR processes such as Onboarding, Job Rotations, Training, and Career Development.

To this end, Delta Contract S.p.A., in its evaluations – both during recruitment and personnel management – exclusively uses objective and meritocratic criteria based on skills, experience, and objective abilities, avoiding prejudices, stereotypes, or considerations based on gender. In this sense, Delta Contract S.p.A. encourages an inclusive culture that values all people in the company equally.

The Company also undertakes not to make use, even indirectly, of forced and/or child labor, as well as to prevent every form of mobbing, abuse, and labor exploitation, whether direct or indirect.

Personnel selection and management

In the recruiting process, the Company rejects any form of discrimination based on criteria other than objective ones of competence, professionalism, and merit, operating - first and foremost - through the evaluation of the candidate's curriculum vitae.

All information and personal data acquired during the selection process are processed in compliance with the legislation on data processing.

All employees are hired regularly, in compliance with the current contractual types.

The systems for assigning tasks and determining remuneration are calibrated to the skills, capabilities, and commitment of individuals, in consideration of the company's interests and the growth prospects of the workers.

Prohibition of discriminatory conduct

The Company, caring deeply about respecting diversity in the workplace, strictly prohibits any behavior that constitutes a form of discrimination based on age, ethnic origin, nationality, gender, sexual orientation, or ethical, religious, political, and/or trade union beliefs.

Equal opportunities and gender equality

Delta Contract S.p.A. ensures equal opportunities in professional development and promotions, basing its evaluations on meritocratic criteria and on professional skills and levels, while simultaneously guaranteeing wage equity between men and women.

The Company guarantees women full and effective participation in corporate life, including in leadership and responsibility positions, at all levels, compatibly with company activities and the employment demand that the company faces from time to time.

Also from this perspective, Delta Contract S.p.A. is proud to present itself to its stakeholders as a virtuous entity that is attentive to the needs of our planet, with a view to full compliance with the goals of the UN 2030 Agenda and, in general, with the inclusivity policies pursued by our country and the European Union.

Salary, benefits and working hours

Delta Contract S.p.A. complies with all applicable laws and regulations regarding wages and working hours, including allowances, benefits, and overtime. Therefore, the Company ensures fair wages and benefits for its employees, in full compliance with current legislation and collective bargaining agreements, along with the regular payment of all insurance, social security, and welfare contributions. In line with what the Company has adopted so far, it guarantees weekly rest periods, annual leave, and compliance with national holidays, as well as maternity and paternity leave, sick leave, and any other leave to the extent permitted by laws, regulations, collective agreements, and industry standards. The maximum weekly working hours must comply with the provisions of current regulations; overtime work

cannot be requested regularly or imposed, but will be performed exclusively on a voluntary basis and, in any case, in compliance with the provisions of the relevant regulations. The Company's wages, benefits, and working conditions have been established to ensure an adequate standard of living for employees and their families.

Freedom of association

Delta Contract S.p.A. is committed to maintaining an open and constructive dialogue with its employees and union representatives. In accordance with local laws, the Company respects the right of all workers to freely associate, join unions, have representatives, join works councils, and participate in collective bargaining. Furthermore, employees acting as workers' representatives may not be penalized or subjected to any form of retaliation in any way due to the role they hold.

Use of company assets

The Company makes various company tools available to its personnel for the optimal performance of their work. Those who use assets owned by or available to the Company must take the utmost care of them.

Employees and collaborators are requested to use them responsibly and prudently, in a manner that is appropriate and pertinent to company objectives, if necessary by consulting their manager regarding methods/limits of use.

In any case, it is strictly forbidden to use the provided assets in ways and/or for purposes that are illicit or not in line with the values of this Code of Ethics.

Know-how, intellectual property, including that of third parties

Delta Contract S.p.A. has a department dedicated to design, where ideas are turned into concrete and feasible projects. The Company invests in all the activities that this area entails: strategic planning, practical implementation, and feasible, effective projects that are in line with the Client's requests.

Furthermore, the Company is committed daily to the research and study of innovation, new technologies, and design that allow the Company to maintain its central role within the business

created. The Company's technical team supports the client in transforming their needs into innovative and tangible solutions.

To protect such assets, it is forbidden to disclose confidential information of the Company, except with written authorization from the Administrative Body of Delta Contract S.p.A.

Delta Contract S.p.A. respects and protects the intellectual property rights belonging to third parties, refraining from any conduct that could constitute a violation of said exclusive rights.

The recipients of this document must operate in full compliance with the industrial and intellectual property rights legitimately held by third parties, as well as in accordance with the provisions contained in laws, regulations, and conventions established for the protection of such rights.

In particular, the Company undertakes to:

- do not commit fraudulent acts suitable to cause a diversion of others' clientele and damage to the company's competitors;
- do not use other people's trade secrets;
- do not illicitly use technologies covered by an already filed patent;
- do not imitate, tamper with trademarks, distinctive signs, patents, industrial designs or models owned by third parties;
- do not engage in any conduct that may constitute usurpation of industrial property rights, alteration, or counterfeiting of distinctive signs of industrial products, or of patents, designs, or industrial models, whether domestic or foreign, and refrain from importing, marketing, or otherwise using or placing into circulation industrial products with counterfeited or altered distinctive signs, or those produced by usurping industrial property rights.

Protection of competition and the market

Delta Contract S.p.A. pursues its business success by recognizing and protecting competition as a stimulus for growth and improvement of the market, as well as of its own activity.

The Company develops its business according to the principles of transparent, fair and honest competition, requiring all its employees to refrain from collusive behavior and from participating in operations that may lead to violations of the rules protecting competition in the market.

Confidentiality of personal data

Delta Contract S.p.A. protects and appropriately uses confidential information and trade secrets relating to its stakeholders, using them exclusively for authorized purposes. The Company is committed to limiting access to such information solely to personnel who need to know it for reasons related to the contract in place with the stakeholders. To ensure the protection of privacy, the Company protects information regarding its employees as well as that relating to third parties acquired within the scope of business relationships. Finally, any direct or indirect form of financial market manipulation, exploitation, use for economic purposes, or investment directly or through an intermediary, which originates from confidential company information, is contrary to the law and therefore strictly prohibited by the Company.

Every Company resource who, in the performance of their activities, acquires personal data is required to process them in compliance with EU Reg. 679/2016 ("GDPR"), national legislation on privacy, as well as relevant internal policies. In this perspective, it is permitted to acquire and process exclusively personal data that is necessary and directly connected to one's functions, ensuring the relevance of the processing to the declared and pursued purposes.

The Company's employees and collaborators must exercise the utmost caution and care in the use of information that is not in the public domain and that derives from the performance of their duties.

Environment and sustainability

Environmental protection is an imperative for the Company, which embraces an ecological perspective oriented towards the well-being of present and future generations. The Company guarantees and promotes strict compliance with current environmental regulations, interpreting them in light of the precautionary principle through the application of ESG protocols with the drafting of the "Sustainability Report".

The Company is committed to disseminating and consolidating, among all its Recipients, a culture of environmental protection and prevention, developing risk awareness and promoting responsible behavior on the part of all involved parties.

Delta Contract S.p.A. firmly condemns any type of action or behavior that is potentially harmful to the environment.

Quality, product safety and eco-sustainable design

Delta Contract S.p.A. has realized the pursuit of the highest quality and product safety standards by implementing and maintaining a Quality Management System in harmony with ISO 9001:2015. The Company's will is to maximize product quality and ensure high levels of innovation and, therefore, invest in the continuous pursuit of technological development, also in collaboration with local communities.

Delta Contract, with reference to the management, production, and release of products and services, defines adequate control systems within its own organization and supply chain. All such defined controls provide for the traceability of products and the compliance of supplied materials with current regulations regarding the environment, health, and safety, as well as those for sale and approval for release on the market. In carrying out its business activities, the Company minimizes its environmental impact and embraces the principles set out in the provisions of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships.

Finally, Delta Contract recognizes and promotes the importance of eco-sustainability and, therefore, promotes the adoption of solutions that reduce the environmental impact of the produced material, atmospheric emissions, energy consumption, and waste production.

Conflict of interest

In the conduct of their activities, all Recipients are required to avoid and refrain from any activity that may interfere with and/or hinder the ability to make decisions in an impartial and objective manner in the interest of the Company.

A conflict of interest shall be understood as the case in which the Recipients pursue interests different from or contrary to the mission of Delta Contract S.p.A., carry out activities that may

interfere with the ability to make decisions in the interest of the Company, or derive a personal advantage from business opportunities of Delta Contract S.p.A. Any conflict of interest, actual and/or potential, must be immediately reported.

Recipients who find themselves in a situation of conflict of interest such as to compromise their freedom to act in the exclusive interest of Delta Contract S.p.A. are required to promptly report it to their hierarchical superior and/or to the Company's top management. Furthermore, they are required to refrain from performing acts that have not been previously authorized, as well as to disclose the conflict of interest, specifying, when possible, the circumstances and reasons that determine it.

Recipients are required to avoid, even in their private sphere, conduct that may, even in appearance, generate risks of conflict situations and/or compromise the objectivity in the exercise of their duties.

Final provisions

Supervision of the application of the Code of Ethics

Delta Contract S.p.A. identifies the Supervisory Body, appointed by resolution of the Board of Directors and in accordance with the provisions of Model 231, as the competent body for verifying the concrete application of this Code of Ethics by all Recipients, within the scope of what is provided for by art. 6 of Legislative Decree 231/2001.

It monitors the initiatives undertaken by the Company in order to disseminate the knowledge and understanding of the Code of Ethics and in particular:

- monitors the application of this Code of Ethics, including through the receipt of any reports and suggestions from wherever they may come;
- evaluates and investigates reports or other information received regarding violations of the Code of Ethics and proposes to the competent functions the application of disciplinary measures against those who are non-compliant;
- verify the consistency between the behaviors actually demonstrated by individuals and the principles, rules, and standards of conduct set forth in this document;

- Suggests any modifications, updates, and additions.

Reporting channels

In order to guarantee the effective application of the Code of Ethics and of any other document of the 231 Model, Delta Contract S.p.A. requests that all those who become aware of cases of non-compliance with the same make a report using the Supervisory Body's email address by sending a report to the email address: odv@dgroup.info.

Whistleblowing

Alternatively, it is possible to make a protected report pursuant to and for the purposes of Legislative Decree 24/2023 (Whistleblowing) using – among others – the web platform available at the following link: <https://whistleblowing.noverim.it/deltacontract>

For further information on the Whistleblowing channel, you can view the Whistleblowing Protocol on the Company's website.

Compliance with the Code of Ethics, Sanctioning system

Compliance with the Code of Ethics constitutes an integral part of the contractual obligations of employees, collaborators and, more generally, of all Recipients of the document.

Delta Contract S.p.A. does not establish business relationships with anyone who refuses to comply with the principles contained in this Code of Ethics.

Any violations shall make the Company's disciplinary measures applicable, modulated in relation to the "circumstances of the fact", or

- (i) the gravity of the infringement;
- (ii) the possible repeated nature of the infringement;
- (iii) the commission with intent or negligence,

as better specified in the Disciplinary System provided for by the 231 Model of Delta Contract S.p.A.

The type of applicable sanction will vary depending on the relationship between the Company and the subject who committed the infringement (in particular, whether they are an employee or a third party).

With regard to employees, non-compliant behavior will be addressed through specific disciplinary measures appropriate to the circumstances of the case, taking into account the provisions of the collective labor agreement in force.

With reference to collaborators, clients, and suppliers, corrective measures to the relationship will be applied, and, in the most serious cases, the termination of the contract.

The application process for the aforementioned sanctions is completely independent of the initiation, as well as the outcome, of any criminal proceedings brought by the Judicial Authority in relation to the facts that constitute a violation of the Code of Ethics.

Adoption and amendments to the Code of Ethics

This Code of Ethics has been adopted by the Company's Board of Directors.

In the event of regulatory changes or in the event of a change in the company organization, this document will be updated as appropriate.

Communication and dissemination of the Code of Ethics

This Code of Ethics is available to all Recipients, who may view it on the Company's website at the following link: <https://dgroup.info>, as well as in paper form at the registered office and operational headquarters.

This document is also disseminated, through information and communication activities, to all Recipients and stakeholders.

Conclusions

The Board of Directors of Delta Contract S.p.A. will provide for a constant update of this Code of Ethics.

Opera (MI), April 30, 2026