

Code of Ethics of Gruppo DP S.p.A.*Approved by the Board of Directors. on 24/10/2024***The company and its mission**

Founded in 1973, the Gruppo DP has specialized since the early eighties in marketing of synthetic monofilament for sport and professional fishing.

The Company's mission has always been to select monofilament and synthetic fibers of the highest quality and specialization, offering products dedicated to each specific technical application.

Thanks to a close and lasting collaboration with the major producers of nylon and fluoro carbon in the fishing tackle business, the company's activity has gradually developed at a global level, building a complex distribution network allows the company to be present in more than 80 countries, with an extremely wide and diverse range of products.

Currently the core business is focused on three main strategic areas of business:

- Sale of finished products under proprietary trade marks;
- marketing of fibres and monofilaments in industrial packaging for further processing;
- manufacture of finished products with third-party brand, according to the specifications requested by customers.

The company believes that continuous improvement of the organization, human and technical resources, quality of relations with customers and third parties, as well as management of all business processes is a fundamental objective to be pursued.

Relevance of the ethical approach to the activity

Gruppo DP is aware of the importance of adopting a Code of Ethics. The society believes that, by contributing with its work marked by a sense of responsibility and moral integrity to the process of development of the economy and civil society, the pursuit of its corporate mission cannot be separated from absolute respect for laws and public regulations, as well as the principles of loyalty, transparency, fairness, honesty, integrity and good faith.

Gruppo DP considers reputation and credibility as key corporate assets. In this perspective, it acts to maintain and develop positive ethical relationships with its stakeholders (stakeholders): customers and public administrations, employees, trade union representatives and collaborators, shareholders and those making investments related to the company's business, suppliers and business partners.

The conduct of business must be guided by ethical principles, because unethical behaviour undermines the relationship of trust between the company and its stakeholders, and encourages negative attitudes and a hostile climate towards the company.

ESG Principles

Gruppo DP is committed to integrating sustainability into all its business operations, recognizing that environmental protection, social welfare and responsible governance are key to long-term success.

The sustainability strategy is based on three main pillars: environmental, social and governance (ESG).

Sustainability objectives include reducing greenhouse gas emissions, using resources efficiently, promoting diversity and inclusion, and maintaining high ethical standards and transparency, Promoting a corporate culture oriented towards sustainability.

Gruppo DP is committed to reducing its CO2 emissions through the optimisation of transport of people and goods, the adoption of clean technologies, energy efficiency and the use of renewable energy sources whenever possible. Gruppo DP promotes the responsible use of natural resources, implementing sustainable water, energy and materials management practices.

Gruppo DP is committed to creating a safe, inclusive and respectful working environment, promoting the physical and mental well-being of its employees by ensuring equal opportunities for all employees.

Gruppo DP adopts governance practices that ensure the transparency and integrity of its operations. The company is committed to communicating clearly and timely with all stakeholders, ensuring transparency of business decisions.

Gruppo DP implements risk management systems to identify, assess and mitigate risks related to the business and is committed to maintaining high standards of regulatory compliance and protecting the interests of stakeholders.

Gruppo DP S.p.A. recognizes that the active involvement of employees is essential for the success of the ESG strategy. The company promotes a corporate culture in which each employee is encouraged to contribute to environmental, social and governance performance and is committed to providing training on ESG principles, To increase employees' awareness and skills on sustainability.

Gruppo DP supports non-profit organisations and projects that improve the quality of life or protect the environment.

Gruppo DP publishes a sustainability report annually documenting progress towards ESG objectives.

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The company believes in the value of work and considers legality, fairness and transparency in its actions and adherence to ESG principles essential prerequisites for achieving its business objectives.

The company has analysed the rules and ethical principles and conduct that should shape internal relations towards staff and external relations to third parties and that, more generally, characterize the conduct of corporate activities, and it considers it appropriate to make them known.

These principles are contained in this Code of Ethics, which the company demands to be observed and applied by all those who work for it.

Scope of the Code of Ethics

The Code of Ethics applies and guides the conduct of all human components of the company, the principles and rules contained therein complement the legislative provisions, the regulations, statutes and contracts governing the operation of the organs of the company and the rights and duties of the addressees of the code itself.

It is binding on the conduct of the directors, employees and collaborators of the company, both internally and externally, who are obliged to enforce these provisions within their functions.

This Code of Ethics is a dynamic model subject to changes and additions in order to improve it and keep it in line with any corporate and social changes.

General principles

The Code of Ethics sets out the general principles governing the activities of the company. These principles guide the operations, behaviour and relations both within and outside the Company.

Under no circumstances is it allowed to adopt behaviors that are contrary to those stated in this Code of Ethics, nor the need to act in the interest of the Company justifies such violation.

All parties involved are obliged to apply the rules and principles contained in the Code of Ethics, contacting their superiors if clarification is needed on how to apply them.

Dissemination of the Code of Ethics

Gruppo DP ensures the widest possible dissemination of the Code of Ethics, also outside the company, providing the necessary interpretative support for the provisions contained therein. The Code, published on the intranet (GDP hub) and on the website of the company www.gruppodp.com, is made known to all interested parties, informing also full contractors, suppliers, contractors and all other stakeholders, both private and institutional, the values that the Company intends to promote and, in general, the corporate policy to which it is inspired.

Whistleblowing

Whistleblowing refers to the practice by which employees, collaborators or other interested parties report wrongdoing, irregularities or violations of internal and external regulations within an organization. Such reports may include a wide range of fraudulent, illegal or unethical behaviour that could compromise the integrity and reputation of the company.

Gruppo DP has voluntarily implemented a specific whistleblowing procedure to promote a culture of transparency and accountability.

Employees, collaborators and other interested parties are encouraged to report any alleged violation of the Code of Ethics or internal or external regulations through a dedicated reporting system. Reports can be made anonymously or by name and can be sent via a dedicated e-mail address: segnalazioni@gruppodp.com.

Gruppo DP ensures the confidentiality of whistleblowers and protects them against any form of retaliation or discrimination. Only a limited number of authorised persons will have access to the information contained in the alerts, and it will be their task to verify alleged violations, ensuring the impartiality and fairness of the control process.

Anonymous alerts will be given the same consideration as named alerts, provided they are sufficiently detailed and substantiated. However, anonymity should not be used to make unfounded or malicious accusations.

The company takes every report seriously and takes all necessary steps to investigate and address reported violations.

Disciplinary action following infringements

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The provisions of this code are an integral part of the contractual obligations assumed by staff and by those with business relations with DP Group.

The breach of the principles and conduct set forth in the code of ethics compromises the fiduciary relationship between the Company and the perpetrators of the breach, whether they are directors, employees, consultants, collaborators, customers or suppliers.

Violations will be prosecuted by DP Group, as follows:

- in the case of employees, through appropriate disciplinary measures, irrespective of whether the conduct is criminal or not and regardless of whether criminal proceedings are instituted where the conduct constitutes a criminal offence. In particular, the penalties will be in accordance with the rules and logic of the employment contract applied. Disciplinary measures range from a recall or admonition to suspension without pay, and in the most serious cases to dismissal. Before a disciplinary measure is taken, the person concerned shall be given an opportunity to explain his or her behaviour.
- As regards consultants, employees, customers and suppliers, specific methods of termination of the contractual relationship will be activated.

This is also without prejudice to any compensation for damages that Gruppo DP may suffer as a result of the violation of the provisions contained in the Code of Ethics by the above-mentioned subjects.

Code of Ethics of Gruppo DP S.p.A.*Approved by the Board of Directors. on 24/10/2024***General principles of the Gruppo DP Code of Ethics****Honesty and legality**

Gruppo DP demands that in the performance of their activities, the addressees of this Code of Ethics adhere to the principles of honesty and legality. They therefore operate in strict compliance with the laws, regulations, statutes and internal procedures. Requests to induce directors, employees and external collaborators to act against the law and the Code of Ethics are not tolerated and are sanctioned.

Respect for the person

The Gruppo DP recognizes the centrality of the person as a fundamental element of development and success of any business and is committed to respecting the rights and physical and moral integrity of the people with whom it relates. The centrality of the person is expressed in particular through the enhancement of its employees (whether they are employees or linked by another employment relationship), attention to the needs and requests of customers, protection and transparency towards the shareholder, Fair and transparent negotiation with suppliers and public authorities.

Work life balance

The concept of work life balance refers to the ability to effectively balance work responsibilities and personal or family needs. Gruppo DP recognises the importance of maintaining a work-life balance, considering this balance as a key element for the overall well-being of employees and their productivity.

The company is committed to promoting practices that support this balance, such as flexible working hours, remote work and leave policies adapted to family events. The aim is to create a working environment that enables employees to meet both their professional ambitions and personal needs, thus contributing to their satisfaction and motivation.

Equal opportunities and inclusion

The Gruppo DP actively promotes equal opportunities and inclusion policies, committed to creating a fair and welcoming work environment for all its employees, regardless of their background. Equal opportunities means ensuring that all employees have the same opportunities for professional development, access to company resources and participation in training initiatives, without discrimination on grounds of gender, age, race, sexual orientation, religion, disability or social status. Inclusion, instead, refers to the creation of a context in which each individual feels valued, respected and supported, fostering diversity as a resource.

Gruppo DP is committed to implementing inclusive practices that include raising awareness of diversity issues, promoting collaboration and mutual respect.

In particular, the company is dedicated to taking measures against any form of discrimination in the process of selection, recruitment and promotion of personnel and promoting a corporate culture that values the different perspectives and experiences of employees.

Ethical use of technology

Gruppo DP recognizes the importance of the ethical use of technology in the conduct of its business. This means using technology in a responsible and transparent way, respecting the rights of individuals and ensuring data security.

The company is committed to implementing systems and practices that protect the privacy of information of employees, customers and suppliers and other stakeholders. In addition,

Gruppo DP promotes the use of sustainable and environmentally friendly technologies, seeking to minimize the ecological impact of its operations.

The company adopts advanced IT security measures to prevent unauthorized access, data loss and other digital threats, thus ensuring trust and protection of sensitive information.

Mobbing

Bullying is a systematic and abusive behaviour by one or more individuals towards a colleague, with the aim of marginalising, psychologically damaging or causing him to leave his job. This can be seen in a variety of actions, including:

- Vertical bullying: where the harassment comes from superiors against subordinates.
- Horizontal mobbing: where harassment is committed by peers.
- Ascending bullying: when pressures and abusive behaviour are directed from subordinates towards superiors.

Gruppo DP recognizes the seriousness of mobbing and is committed to combating it through a range of measures. The society has a zero tolerance approach to all forms of harassment and provides for prompt and decisive action against perpetrators. It also promotes a respectful and collaborative working environment, raising awareness of mutual respect and effective communication.

Code of Ethics of Gruppo DP S.p.A.*Approved by the Board of Directors. on 24/10/2024***Fairness and impartiality**

Gruppo Dp in any action, whether directed internally or externally, avoids any discrimination on the basis of age, sex, health status, race, nationality, political opinions and religion of its interlocutors.

Transparency, completeness and veracity of information

The directors, employees and external collaborators of the Company undertake to provide information that is true, complete, correct, adequate and timely both outside (public administration, authority, market, users) and within the Company. Information is provided in a clear and simple manner, normally by written communication.

Quality of the activity

Gruppo DP pursues the quality of its business organization and products and services. The company's activity is turned to customer satisfaction, considered as the assets that guarantee the very existence of the Company. To this end, the directors, employees and collaborators of the Company take into account the requests of the customers aimed at promoting an improvement in the quality inherent to the marketing activity and service.

Documentation of transactions and transactions

Each transaction and company's transactions must be properly recorded, authorized, verifiable, legitimate, consistent and congruent. Gruppo DP observes the rules of a correct, complete and transparent accounting of business events, according to the criteria indicated by the legislative provisions and accounting principles. In the activity of accounting for facts relating to the management of the company, employees and collaborators are required to scrupulously respect the applicable legislation and internal procedures so that each transaction is, as well as being correctly recorded, Also authorized, verifiable and legitimate.

Protection of privacy

Gruppo DP protects the confidentiality of data, information and news in its possession relating to its activities in accordance with current legislation. The Company ensures that the principle of confidentiality is respected and safeguarded also by directors, employees and collaborators who are prohibited from using confidential information for purposes not related to the exercise of their duties. All information and documents relating to the organization and business, know-how, products and services, customers, suppliers and personnel shall be treated as "confidential".

Criteria for behaviour towards staff and external collaborators

The Gruppo DP protects equal opportunities in the selection and development of personnel also through non-discriminatory assessments of the professional profile and psycho-attitudinal and respect for the privacy and opinions of the candidate.

The directors and heads of organizational structures are responsible for ensuring that equal opportunities are respected in the management of employment relationships and that there is no discrimination at work.

Each manager is required to value the work of employees on the basis of merit, competence and professionalism criteria, requiring performance consistent with the activities assigned to them. Gruppo DP promotes employee and external involvement by involving them in the company's objectives and their achievement.

It is an abuse of a dominant position to demand, by virtue of its role, personal favours from subordinate figures or any other behaviour that constitutes a violation of this Code of Ethics.

Criteria for safety at work

The Gruppo DP considers the health and safety of workers at work to be of prime importance. This is part of the company's policy of constant attention to its human resources, which are hosted in work environments designed to facilitate communication and operation and fully comply with safety and workplace hygiene regulations.

To this end, Gruppo DP has equipped itself with professionals with specific competences in the field of safety and environmental health. The presence of the competent doctor and internal organizational support and external specialists, allow the company to address any specific problem in terms of prevention and in full and constant compliance with the legal regulations.

The Company is committed to spreading and consolidating a safety culture, developing risk awareness and promoting responsible behaviour by all its staff and all external collaborators.

Gruppo DP adopts all the safety measures required by technological and methodological developments to ensure a safe and healthy working environment, namely:

- It has developed and regularly updates a risk assessment document specific to each business unit.
- It shall endeavour to eliminate risks and, where this is not possible, work towards their reduction and control in the light of new knowledge and technical progress.
- It is committed to the observance of ergonomics and safety principles in the organization of work, the design of workplaces, the choice of equipment and the definition of working methods.
- It has a health surveillance programme for workers at specific risk.

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- It has a training and information programme for the company's internal SPP members and all its employees.
- He has drawn up safety work procedures and emergency procedures which have been disseminated to all workers affected by them. Training sessions on these topics are regularly renewed
- Promote the participation and consultation of workers and/or their representatives in safety matters.
- Hold regular security meetings in addition to the annual meeting, where they plan and report on the status of actions deemed appropriate to ensure improvement over time of security levels.
- It implements a routine maintenance and inspection programme for work equipment, PPE and installations.

All staff shall comply with internal rules and procedures on risk prevention, health protection and safety, and report any deficiencies or non-compliance with applicable rules in a timely manner. Each employee and external collaborator acts in order to protect the resources and assets of the company, avoiding misuse that may cause damage or reduce efficiency, or otherwise contrary to the interest of the Company. It is the responsibility of the employees not only to protect these assets, but also to prevent their fraudulent or improper use.

Protection of the environment

Gruppo DP considers the protection of the environment essential for quality of life and sustainable development and is committed to a responsible and ethical management of the impacts that its activities have on the environment of the local and global community of which it is part. Gruppo DP aims to reconcile the company's objectives of economic development and value creation with respect for and protection of the environment and natural resources.

This commitment is primarily achieved by respecting the current legislation in this area and the company procedures defined from time to time.

Group DP, taking into account its size and the characteristics of the markets in which it operates, will seek to act - with a view to continuous improvement - according to the following principles:

- The spread of a culture within the company aimed at implementing the correct forms of behaviour from the point of view of environmental protection;
- use of equipment, installations, means and materials which conform to the characteristics of the environmental legislation in force;
- Rejection of waste;
- Progressively improving the efficiency of use of natural resources (for example energy, water, paper, fuels);
- The purchase (where possible and subject to equal functionality) of equipment, work tools and consumer goods with a lower environmental impact;
- Gradually optimise waste generation, including by promoting separate collection, recycling and recovery activities;
- Develop awareness of the environmental implications of logistics and mobility;
- Reducing the environmental impacts of business travel by promoting greater use of public transport systems and/or less environmentally damaging systems, and where possible using virtual communication tools;
- In the development of marketed products, progressively adopt a logic of containing environmental impacts throughout the life cycle of products, including their potential to be recycled/re-used at the end of their useful life;
- Evaluate suppliers also through logics of attention to the environment.

Computer security

Gruppo DP attaches great importance to computer security as the basis for the security of all internal and external processes managed by the computer system. The employee uses and carefully guards the assets he has and assigned to him for exclusive reasons of work, different or illegal use of resources owned by the company is not allowed.

It is in any case explicitly forbidden to use them for purposes other than business.

Each employee is directly and personally responsible for the protection and lawful use of assets and resources entrusted to him in the performance of his duties. The company shall, in accordance with applicable law, take the necessary measures to prevent any misuse of the same.

With respect to the use of computer systems, each employee is responsible for the security of the systems used and is subject to the applicable regulatory provisions and the terms of license agreements. Except as provided by the civil and criminal law, misuse of company assets and resources includes the use of network connections for purposes other than those inherent to the employment relationship or the deliberate access, recording, sending, publishing: pornographic images or texts with explicit sexual content or related to sexual exploitation; material that promotes violence, hatred, terrorism and intolerance towards others; material that is offensive, obscene or obscene.

Each employee is also required to make the necessary efforts in order to prevent possible crimes by using computer tools. The professional figure of the Manager of management systems is the reference for the implementation and management of the computer system, it is also responsible for issuing access credentials.

Conduct of business criteria

The behaviour of the directors and each employee and external collaborator of the Company conforms to the principles of legality, loyalty, fairness, transparency and professionalism.

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They are required to maintain, in their dealings with third parties, ethical behaviour that is respectful of the laws, the principles of this Code and internal regulations, as well as being as fair and honest as possible.

Employees and collaborators shall refrain from any behaviour or statements that may damage the image or harm the Company.

In commercial and promotional relationships, practices and behaviour of fraud, corruption, favouritism and more generally any conduct contrary to the law are prohibited, the regulations, internal rules and procedures and guidelines of this Code of Ethics. Such conduct is prohibited and sanctioned regardless of whether it is carried out or attempted, directly or through third parties, to obtain personal benefits for others and the Company itself.

No gift or receipt of any gifts by directors, employees and external collaborators shall be permitted that may even be interpreted as exceeding normal commercial practices or courtesy, or otherwise aimed at acquiring preferential treatment for itself or in the conduct of any activity connected to the Company. In particular, it is forbidden to give any form of regalia to Italian or foreign civil servants or public service providers or their family members that could affect the independence of judgment of those officials or lead to ensuring themselves, others or the Company any advantage. This principle applies not only to gifts promised or offered, but also to promises or received from third parties.

The company's conduct in the procurement of general goods and services is guided by the pursuit of maximum competitive advantage, fairness and impartiality of judgment.

The criteria for selecting suppliers are based on the evaluation of quality and cost-effectiveness, technical and professional suitability, respect for the environment and social commitment, according to internal rules dictated by specific regulations. In order to facilitate the adaptation of suppliers' offers to these standards, the company undertakes not to abuse its contractual power by imposing conditions that are unfairly or excessively onerous. In the choice of suppliers, undue pressure is not allowed and accepted, aimed at favoring one supplier to the detriment of another and such as to undermine the credibility and confidence that the market places in the Company, on transparency and rigour in the application of law and internal regulations. Likewise, no benefits or promises of favours by the directors, employees or external collaborators of the Company are allowed to third parties, in order to obtain an interest or advantage of their own, others or the Company.

Standards of conduct in relations with suppliers based in developing countries

In full compliance with the above mentioned criteria for conducting business, in managing its relationship with suppliers based in developing countries, Gruppo DP intends to "export its ethics" Promoting relations with businesses that share similar principles, and encouraging their development through fair price negotiations and long-term stability of the business relationship.

The parties responsible for selecting and managing relations with these suppliers should:

- Where possible, give priority to relations with companies that share similar ethical and ESG principles;
- Verify, as far as possible, that suppliers ensure full respect for human rights within their facilities;
- Check, as far as possible, that suppliers ensure a sufficient level of safety and health at work, that they do not implement policies which discriminate against staff or exploit child labour.

Fight against corruption

Gruppo DP rejects and condemns without exception any act of active or passive corruption, as this is prohibited by law throughout the world and impedes economic and social development and fair and legitimate competition between companies.

Therefore, it is strictly forbidden to Directors, Employees and Collaborators - whatever the circumstances - to offer, give, solicit or receive bribes or any other form of corruption (direct and indirect). This prohibition operates worldwide without exceptions due to local customs or practices. Failure to comply with anti-corruption laws can result in heavy criminal penalties for those responsible. In the event of corruption, Gruppo DP will take the strictest disciplinary measures permitted by current legislation, reserving additional protection in civil and criminal matters.

Combating tax evasion

Gruppo DP is committed to combating tax evasion in all its forms, requiring its customers and suppliers to strictly comply with the current tax legislation.

Business transactions and relationships must be traceable and documented in a transparent manner, ensuring that all financial and commercial transactions comply with tax regulations.

The entities responsible for managing relations with customers and suppliers must verify, as far as possible, that the counterparties are not involved in tax evasion practices and that they maintain a correct and legitimate fiscal conduct.

In case of suspicion of tax evasion, Gruppo DP provides a series of checks and actions to deal with the situation effectively and in accordance with current regulations. First of all, you need to collect all relevant information and documentation on suspicious transactions. Subsequently, it will be appropriate to carry out an in-depth analysis of the business transactions and relationships involved, to identify any inconsistencies or irregularities.

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If the checks reveal a reasonable suspicion of tax evasion, the appropriate staff shall immediately report the situation to management for appropriate action. Gruppo DP cooperates fully with the tax and judicial authorities, providing them with all the information and documents required for investigations.

Criteria for conduct in relations with institutions and public administration

In their relations with the institutions and public administrations, the parties responsible must always be guided by the principles of legality and fairness and are bound to maximum transparency, clarity and correctness so as not to lead to partial interpretations. The institutional entities with which relations are maintained in various capacities are distorted, ambiguous or misleading.

No benefits or promises of favours from the directors, employees or external collaborators of the group are allowed to public officials or public service representatives (such as representatives of the public administration, authorities and local authorities), in order to achieve an interest or benefit of its own, of others or of the Company. The behaviour of courtesy and hospitality which is part of normal business conduct and relations must be consistent with the principles set out in this Code of Ethics.

Funding to political parties or organisations with conflicts of interest

Gruppo DP does not finance political parties or organisations in Italy or abroad, their representatives or candidates and does not accept any type of pressure, direct or indirect, from political exponents. Gruppo DP does not normally make contributions to organisations or entities with which a conflict of interest may be identified; However, in some situations, collaboration, including financial collaboration, on specific projects is eligible provided that the allocation of resources is clear and documented.

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