

CODE OF ETHICS AND CONDUCT

1. Basic concept and Validity

At Metis Lighting, we are committed to socially responsible corporate governance, taking into account the direct and indirect effects of our activities on society and the environment, constantly seeking to achieve an appropriate balance of interests in economic, social, and ecological terms. We act in accordance with generally accepted values and principles, such as integrity and legality, and observe internationally recognized human rights and labor standards, as indicated in the Code of Ethics and Conduct.

We share the objectives and contents of the Code of Ethics and Conduct and, wherever possible, will make all appropriate and reasonable efforts to continuously comply with this voluntary commitment, both legally and factually, during all phases of our activities, both in Italy and abroad.

2. Human Rights and Labor Standards

We respect internationally recognized human dignity and human rights, as established particularly in the United Nations Universal Declaration of Human Rights (UN) and provided for in the United Nations Guiding Principles on Business and Human Rights.

In carrying out all our activities, we strive not to cause or contribute to human rights violations. We expect the same from our business partners and encourage our suppliers to do likewise. We observe our Clients' Codes of Conduct, ensuring we comply with what is indicated by the Client.

2.1 Employment Relations

We treat our employees and collaborators with respect. We reject any form of illegal punishment, abuse, harassment, intimidation, or other treatment that does not respect workers' dignity. We adhere to current employment legislation in all employment relationships and expect the same from our contractual partners. Upon hiring, employees must be clearly informed about the essential terms and conditions of employment, including their rights and duties, as well as working hours, compensation, and payment and settlement methods.

We respect and protect employees' right to terminate employment in accordance with the prescribed notice period.

2.2 Prohibition of Child Labor and Protection of Young Workers

We do not tolerate child labor and respect the legal minimum age for employment.

Under no circumstances do we hire people who are still of compulsory school age or under 15 years old. In case of confirmed child labor, all necessary measures will be taken

immediately aimed at ensuring the child's welfare, protection, and development. For workers under 18 years of age, we respect the rights of young workers, who may only be employed under working conditions that do not put their health, safety, or moral integrity at risk, nor are harmful to their development.

2.3 Prohibition of Forced Labor

We reject any form of forced or compulsory labor, including any type of bonded labor, servitude, slavery or similar practices, human trafficking, or other work activities and services not voluntarily provided that are incompatible with internationally recognized social and labor standards.

2.4 Compensation

Regarding compensation for work performance, we comply with legal provisions and those of the collective labor agreement.

For employees, we ensure that the salary paid does not fall below the minimum wage provided for in the collective agreement. We do not apply wage deductions not permitted by law.

2.5 Working Hours

For employees, we comply with legal or collective agreement provisions regarding working hours.

2.6 Freedom of Association

We respect workers' right to freedom of association, assembly, and collective bargaining.

2.7 Diversity and Inclusion, Non-discrimination

We promote a work environment that fosters inclusion and values the diversity of our employees. We are committed to equal opportunities and reject any form of discrimination or unjustified disparity in treatment at work, for example based on national and ethnic origin, social conditions, health status, disability, sexual orientation, age, gender, political opinions, religion, or personal beliefs.

We also respect the principle of equal pay between male and female workers for equal work.

2.8 Workplace Health and Safety

We comply with national and international standards on workplace health and safety.

We ensure a healthy and safe working environment to protect our employees, protect third parties, and prevent accidents, injuries, and occupational diseases.

For this purpose, we regularly assess workplace risks and implement suitable safety measures, including the provision of adequate personal protective equipment, aimed at preventing dangerous situations. We ensure our employees receive adequate training regarding workplace health and safety.

Any worker is prohibited from consuming alcohol, illegal drugs, or any other substance that prevents the worker from performing their work safely.

3. Ecological Responsibility

The protection and conservation of natural resources concern and involve all of us. With this awareness, we carry out our activities with due consideration for environmental aspects and are committed to ensuring a zero-impact future.

3.1 Environmental and Climate Protection

We fulfill our environmental responsibility by complying with current laws and recognized standards for environmental and climate protection, constantly striving to reduce the impact of our activities on the environment and climate. We have adopted appropriate measures based on internationally recognized legal standards that concern, among other things, the following points:

- Efforts to reduce or eliminate waste with differentiated collection at all levels
- Conservation of natural resources, with the adoption, for example, of measures to save water and other raw materials
- Promotion of climate-friendly and environmentally respectful circular technologies, processes, raw materials, and products
- Efforts to increase energy efficiency and the share of green or renewable energy we use in our company headquarters

4. Ethical Business Conduct and Integrity

We pursue only legitimate business objectives and practices and maintain business relationships only with respectable partners. We behave fairly and respectfully towards our business partners and customers. We adapt to the different legal, economic, social, and cultural contexts and circumstances of the countries and regions in which we operate.

Our business actions are always based on universally recognized ethical values and principles, including integrity and respect for human dignity. We support free and fair global trade and respect the laws and regulations of the countries and regions in which we conduct our activities.

4.1 Corruption, Market Control, Money Laundering

We reject any form of corruption and extortion and avoid any situation that might appear as such, both in terms of granting and accepting unfair advantages. We act in compliance with regulations regarding import and export controls and respect laws to prevent money laundering. The company has adopted a policy to collect and approve donations and receipts of money, gifts, invitations, benefits, or anything that could be perceived as a bribe. Gifts and gratuities in general are considered "items of value" and as such, can never be offered for the purpose of exercising improper influence on a public official or private individual.

Employees and collaborators cannot accept gifts, trips, entertainment activities without informing and receiving authorization from the Partners.

4.2 Fair Competition

We support free and fair competition. We reject anti-competitive agreements and ensure we act in compliance with current antitrust laws.

We reject competitive advantages obtained through unfair business practices.

4.3 Personal Data, Protection of Confidential Information and Intellectual Property

We respect the privacy rights of our employees, business partners, and customers and apply current laws and standards for the processing of data and security of personal information.

We strive to ensure that business secrets and other confidential information of our business partners and customers entrusted to us are adequately protected from unauthorized acquisition, use, and disclosure, at least in accordance with legal provisions regarding the protection of business secrets. We respect the intellectual property of our business partners, customers, and other third parties, ensuring that sufficient precautions are taken to protect intellectual property rights during the transfer of know-how and technologies.

4.4 Reports and Suggestions for Improvement

We promote a culture of openness in all relationships between staff and all people we come into contact with.

Effective and honest communication is essential for continuous improvement. If any employee or collaborator feels the need to report certain issues or propose improvement actions, even confidentially, they can use the mailbox located near the break area.

5. Implementation

We do everything reasonably possible to continuously comply with the contents of the Code of Ethics and Conduct throughout our company.

For this purpose, we have designed suitable measures and processes and document their implementation within the company adequately. The Partners periodically verify the implementation of the content.

5.1 Communication and Training

We inform our employees, external collaborators, business partners, and other key stakeholders of the contents of the Code of Ethics and Conduct.

When necessary, we train our employees and collaborators on individual points of the Code of Ethics and Conduct. We expect them to respect it.

5.2 Expectations for Our Supply Chains, Control Measures

The contents of the Code of Ethics and Conduct also reflect our expectations towards our suppliers and other counterparties involved in defining the projects carried out. In this regard, we expect them to be inspired by the contents of the Code of Ethics and Conduct or to apply a similar one, encouraging them to demand the same from their suppliers. In principle, we cultivate long-term business relationships based on partnership. To this end, before establishing a supply relationship, we carefully identify and verify our counterparties, for example through self-assessment, supplier evaluation, or similar. We reserve the right to monitor our suppliers' compliance with these conditions. The possible verification of serious infractions may reasonably lead to contractual consequences, including the termination of the business relationship. In any case, we expect that identified violations will be followed by adequate preventive or corrective measures.

5.3 Reporting of Violations

Every violation of the Code of Ethics and Conduct is taken seriously. When we receive reports in this regard, we work to clarify the situation adequately and confidentially and, if necessary, adopt appropriate countermeasures aimed at preventing or remedying the violation.

Milan, January 28, 2025