



BEHAVIORAL GUIDELINES OF DROPSA GROUP

**QUALITY, INNOVATION
AND TEAMWORK**

1. INTRODUCTION	2
1.1. RECIPIENTS	3
1.2. GENERAL PRINCIPLES AND CORPORATE MISSION	3
1.3. RISK MANAGEMENT	4
1.4. RESPECT FOR HUMAN RIGHTS	4
1.5. COMPLIANCE WITH APPLICABLE LAWS	4
1.6. PREVENTION OF CONFLICTS OF INTEREST	4
1.7. MANAGING COMPANY ASSETS WITH DUE CARE	5
1.8. STORAGE OF DOCUMENTS	5
1.9. APPROPRIATE CONDUCT IN PUBLIC	5
1.10. SUPPLIERS	6
2. UNJUST COMPETITION	8
2.1. ANTI-CORRUPTION	9
2.2. PREVENTION OF MONEY LAUNDERING AND TERRORIST FUNDING	9
2.3. EXPORT CONTROL AND PENALTIES LAW	10
2.4. TAXES AND CUSTOMS DUTIES	10
2.5. TECHNICAL CONFORMITY	10
3. DIGITALISATION	12
3.1. PROTECTION OF COMPANY-RELEVANT INFORMATION	13
3.2. PROTECTION OF PERSONAL DATA	13
3.3. IT SECURITY	13
3.4. PRIVACY AND DATA PROTECTION	13
3.5. SOCIAL MEDIA	13
4. HUMAN RIGHTS, ANTI-BRIBERY AND CORRUPTION	16
4.1. FAIR WORKING CONDITIONS AND PROFESSIONAL DEVELOPMENT OF EMPLOYEES	17
4.2. DIVERSITY AND PRINCIPLES OF EQUAL TREATMENT	17
4.3. WORK AND FAMILY BALANCE	17
4.4. PROHIBITION OF FORCED LABOUR AND CHILD LABOUR	17
4.5. DIALOGUE WITH EMPLOYEES AND EMPLOYEE REPRESENTATIVES	17
5. OCCUPATIONAL HEALTH AND SAFETY	18
5.1. ENVIRONMENTAL POLICY	18
5.2. WHISTLEBLOWING	19
6. BREACH OF THE CODE OF ETHICS	20



The Code of Ethics adopted by **DropsA** is a set of principles and rules of which observance is of fundamental importance for the proper functioning and improvement of the Company's reputation. It is the "charter of fundamental rights and duties" through which the Company:

- Clarifies its ethical and social responsibilities towards different internal and external stakeholders;
- Seeks ways of balancing and/or achieving a balance between multiple interests and the legitimate expectations expressed by stakeholders.

The main purpose in adopting this Code is thus to best meet the needs and expectations of the Company's stakeholders, with the aim of advocating and promoting a high level of professionalism and prohibiting conducts that conflict not only with the regulatory provisions identified from time to time, but also with the values that the Company intends to promote.

The individual and collective conduct of Company employees and collaborators must be in line with Company policies and must concretely result in cooperation, social responsibility and compliance with current legislation, following the standards of conduct identified in the Code of Ethics.

1.1. RECIPIENTS

The Code of Ethics is addressed to all those who, whether employees or collaborators, establish direct or indirect, stable or temporary relations or relationships with the Company or otherwise work to pursue the Company's objectives. They will hereinafter be referred to as "employees". Employees who violate the principles and rules contained in this Code, damage the relationship of trust established with the Company. All employees are required to be familiar with the Code of Ethics, to contribute to its implementation, improvement and dissemination.

1.2. GENERAL PRINCIPLES AND CORPORATE MISSION

DropsA's mission is to be the world's leading provider of products and services, offering innovative solutions that meet customers' needs and using its expertise to deliver quality and value. To fulfil this mission, all **DropsA** employees must adopt conduct that reflects the shared values.

Our core values include:

- Innovation
- Professionalism of people
- Mutual trust
- Mutual respect
- Customer satisfaction
- Continuous improvement

These values define who we are and what we stand for, so we expect that they unite us within our organisation and motivate people to work for us and customers to buy our products.



1.3. RISK MANAGEMENT

We are committed to adopting a solid risk management ethos across the Group. Effective risk management is part of our strategic planning procedure. In our business areas we will aim to:

- Identify, analyse and categorise risks coherently and consistently, by using common systems and procedures;
- Manage risks at all levels: local, regional, Company and Group level;
- Incorporate key risks and mitigation actions into strategic and operational business plans;
- Integrate risk management into our core business activities, functions and procedures.

1.4. RESPECT FOR HUMAN RIGHTS

Respect for human rights is an integral part of **DropsA**'s corporate social responsibility. The Company is committed to implementing the 'UN Guiding Principles on Business and Human Rights', the ten principles of the UN Global Compact, and the eight core conventions of the International Labour Organisation (ILO). Therefore, all employees respect the dignity and individual rights of all individuals and parties with whom the Company has links through its activities, business relations and products. **DropsA** actively prevents and eliminates human rights violations. **DropsA** strives to positively influence the individual rights of all parties.

1.5. COMPLIANCE WITH APPLICABLE LAWS

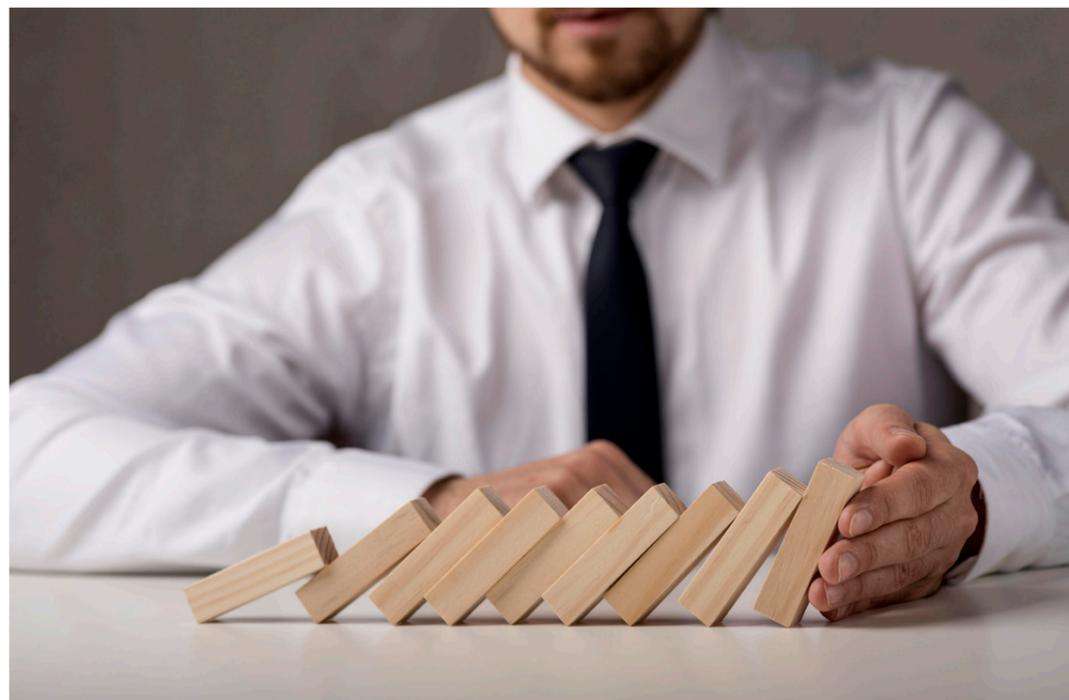
DropsA and its employees observe and comply with all applicable local, national and international laws and regulations. Compliance with these laws and regulations is the basis for **DropsA**'s long-term economic success. Violation of these laws and regulations can cause considerable damage and have serious consequences for the Company, collaborators, business partners and other stakeholders.

1.6. PREVENTION OF CONFLICTS OF INTEREST

DropsA expects that its employees will act with loyalty and integrity. This means that all employees act in the best interests of **DropsA** during the period of their employment with the Company and when making business decisions in the best interests of the Company. All business transactions must be recorded and documented accurately and appropriately. Our representatives, agents, consultants and professionals must be appointed in accordance with these principles.

Our assets and confidential information must be protected with the utmost care, and must not be used by individual employees for personal gain. Employees must not engage in activities that result, even apparently, in a conflict between their personal interests and the interests of **DropsA**.

Such conflicts of interest could arise in the following cases: ownership of shares, direct or indirect personal interests in contracts and tenders, requesting or accepting gifts or other benefits beyond generally acceptable levels for work, employment external to **DropsA**, and use of confidential information. Economic or other personal interests must not negatively interfere with or hinder the interests of **DropsA**. Therefore, employees are required to avoid situations in which personal interests or actions conflict with the interests of the Company. If conflicts of interest cannot be avoided, they must be declared and employees must work with their supervisors to find a solution that protects **DropsA**'s interests.



1.7. MANAGING COMPANY ASSETS WITH DUE CARE

DropsA and its employees manage corporate assets carefully and responsibly. Company assets include tangible assets such as buildings, plant and production equipment, as well as IT technology, software, data and intellectual property. All employees are responsible for using the resources, production equipment and information made available to them in the exclusive interest of the Company. They are required to protect them from negative effects and keep them in optimal condition. Employees must comply with and adhere to the regulations and specifications concerning the use and safety of Company assets.

1.8. STORAGE OF DOCUMENTS

'Document' means all documents on electronic media and on 'hard copy' as well as drafts of documents, e-mails, notes and handwritten notes. These documents are to be managed according to the Company guidelines, by keeping copies, archiving essential documents and destroying unused documents. Compliance with the guidelines shall be monitored by persons in key roles within the Company.

The guidelines must also indicate the handling of electronic copies of messages or documents. If documents on paper can be deleted, copies on disk or in back-ups must also be deleted.

1.9. APPROPRIATE CONDUCT IN PUBLIC

DropsA expects that its employees avoid making public statements on behalf of the Company and instead of reporting any questions to the Corporate Communications department. **DropsA** is positive towards the use of social media networks by employees and respects their right to express personal opinions. When expressing personal opinions in public, employees are expected to observe normal courtesy and maintain a respectful tone. Employees can find guidelines for proper conduct in social media in **DropsA**'s social media guidelines and netiquette. **DropsA** is committed to ensuring that accurate information about its business is made available to the market, subject to Management approval.

For this purpose, it is vitally important to work according to a transparent internal communication policy, which allows important information to be transferred from individual departments to the Management. To ensure that information is properly disclosed publicly, only certain persons appointed by the Management are authorised to make public statements to the media. These public statements include communications which take place through social media and social networking technologies.

The types of information that may require disclosure to the market include, but are not limited to:

- A significant change in actual financial conditions;
- A significant acquisition or disposal of assets;
- The awarding of an important new contract to third parties;
- A significant event affecting business activities such as natural disasters;
- The initiation or conclusion of an important legal dispute.

1.10. SUPPLIERS

DropsA is committed to being a responsible valuable partner in the supply chain by continuously developing a sustainable Company that serves its customers, employees and the communities in which they are located. A strong and dynamic supplier base is essential to **DropsA's** long-term success. **DropsA** relies on the experience and expertise of suppliers to meet the changing needs of customers. **DropsA** is committed to achieving total security in the workplace.

This means: no environmental damage and no negative impact on human rights. We expect our suppliers to work safely and with respect for the environment and human rights.

DropsA is committed to working with suppliers to develop more efficient, safer and sustainable supplies by respecting the principles and values defined in the Code of Conduct.

- All activities must be conducted in accordance with the laws and regulations of the countries in which the Company is located.
- We expect our suppliers to adhere to fair competition practices in the markets in which they operate.
- Corrupt practices are not acceptable.
- Bribery payments shall not be made or accepted from or to any person.
- Our suppliers' expressions and actions must be respectful of the diversity of people and cultures we work with.
- We expect our suppliers to uphold a culture of diversity and inclusion.
- We expect our suppliers to meet the same minimum employment age requirements as defined in the Declaration of Human Rights.
- We work with safety and apply the industry's best practices in health, safety and welfare, and we expect the same from our suppliers.
- It is a minimum requirement for suppliers that all their operations comply with all applicable environmental laws and regulations.



2. UNJUST COMPETITION

DropsA embodies fair and undistorted competition.

The antitrust laws of markets where **DropsA** operates and where **DropsA's** business activities may have consequences are followed and adhered to by both **DropsA** and its employees. Nearly all countries have laws and regulations prohibiting agreements, understandings and coordinated actions among competitors, suppliers and distributors that could prevent or are intended to prevent competition. The same goes for the improper use of market leverage by one-sided action.

DropsA strongly expects its employees not to engage in practices that violate competition and antitrust laws.

DropsA strives for continued success by competing effectively and fairly in the markets in which it operates.

Non-competitive conduct goes against the interests of our customers, and is also unacceptable to the community at large. The Board of Management has a duty to comply with competition laws in its business area and ensure that staff receive appropriate training and have manuals available for reference. Furthermore, it must identify which business areas are most susceptible to the risk of competition, and find appropriate solutions through regular training programmes.



DropsA's corporate policy is to comply with all competition laws in every country in which it operates.

The imposition of restrictions of a competitive nature on customers, distributors or vendors may cause legal problems.

- When dealing with a competitor, for example, as a supplier or customer or in relation to any industry standards issue, one should be cautious.
- Any exchange with one's competitors that improves one's market position or helps justify an investment is potentially illegal.
- Any acquisition that is designed to achieve a 'dominant market position' entails risks.
- The imposition of competitive restraints on customers, distributors or vendors can be a source of legal problems.
- Employees must be informed of the penalties that could be applied to them and also to **DropsA** in the event of anti-competitive conduct.

UNJUST COMPETITION

2.1. ANTI-CORRUPTION

DropsA does not tolerate any form of corruption.

Any conduct by employees and business partners that could give the impression that business decisions are unacceptably influenced is prohibited. **DropsA** aims to prevent the impression that business decisions or economic success depend on benefits received.

Gifts and Hospitality

Benefits such as gifts, invitations or other valuables are only allowed if they are appropriate and transparent. The offering and acceptance of benefits in any form with the aim of influencing people in the public or private sector is prohibited. Granting benefits to public officials, government officials or representatives of such parties, with the aim of improper business dealings, will not be tolerated. The same applies to facilitation payments and indirect benefits, e.g. through business partners or other third parties. Facilitation payments are payments of small amounts, not officially agreed upon, to government officials in order to encourage them to carry out routine practices that they are already required to perform. Therefore, **DropsA** employees must comply with the anti-corruption laws of the Countries where **DropsA** conducts commercial activities. The corporate guidelines for the prevention of corruption also apply to all employees. In the case of acquisitions, relocation of investments and the creation of joint ventures, the supervisory boards may have to be informed and their authorisation requested, in accordance with competition laws.

Donations and Sponsorships

DropsA is aware of its social responsibility. Donations are intended to support non-profit initiatives. Donations are not made to political parties or their representatives, politicians, members of parliament and candidates for public office or individuals. Sponsorship is used to generate a positive public image and perception of **DropsA** in a lasting way. Caution must be used with requests for and offers of donations and sponsorship, as this type of benefit can also be interpreted as a form of (hidden) bribery. All donations and any sponsorship must therefore comply with the relevant laws and **DropsA's** internal regulations, and require special approval which involves the Compliance department.

2.2. PREVENTION OF MONEY LAUNDERING AND TERRORIST FUNDING

DropsA fulfils its legal obligations to counter money laundering and terrorist funding. The Company does not participate in, allow or tolerate money laundering and terrorist funding. Each employee is required to report all financial transactions that could even minimally give rise to the suspicion of money laundering and have such transactions examined by the responsible Compliance department.

2.3. EXPORT CONTROL AND PENALTIES LAW

National and international laws and directives regulate import, export, trade, brokerage and financing transactions, the provision of services and the shipment of goods (physical goods, software and technology). Through appropriate procedures, **DropsA** ensures that transactions and activities with third parties and within the **DropsA** Group do not violate export control laws and sanctions.

2.4. TAXES AND CUSTOMS DUTIES

DropsA is committed to complying with all applicable tax laws and customs regulations. It does not pursue any undue tax avoidance strategies. **DropsA** is aware of its social responsibility as a Company and the need for adequate state funding.

DropsA is prepared to contribute adequately to tax revenues in Italy and abroad in accordance with the **DropsA** Group's capabilities. It cooperates with financial administrative bodies in an open and respectful manner.

2.5. TECHNICAL CONFORMITY

For **DropsA**, the primary goal of product safety is to safeguard the health and safety of people.

Every effort is made to ensure the conformity of all processes, products and services by observing the guidelines and regulations in force at the time of their release, in particular the legal regulations on product safety regarding development, manufacture, use and characteristics. In this context, **DropsA** takes into account the latest knowledge and technology, and the well-founded safety expectations of end users throughout the entire life cycle. **DropsA** overcomes the technical compliance challenges by constantly reviewing the entire range of its products. Technical compliance for **DropsA** is the appropriate combination of technical and legal competences and the systematic integration of these into the administrative structure.





Digital possibilities, such as the automation of business processes, the ability to extract increasingly more information from structured and unstructured data, and cutting-edge forms of connectivity both within the Company and with external stakeholders, open up opportunities for **DropsA**, its employees and customers along the entire value chain. **DropsA** processes data responsibly. Digital solutions are pursued sustainably and in a value-centric way. **DropsA** fully guarantees the highest possible level of cybersecurity and data protection in all internal and external solutions.

3.1. PROTECTION OF COMPANY-RELEVANT INFORMATION

DropsA protects Company-relevant information from misuse, loss, destruction and manipulation. To do this, we use suitable security standards and implement appropriate confidentiality measures. This applies not only to the Company's proprietary information, but also to confidential information that is entrusted to **DropsA** by its business partners. IT security and cybersecurity are a high priority for **DropsA** and its goal is to continuously improve the implementation of the following security objectives: confidentiality, availability and integrity. The necessary regulatory framework is provided by a cybersecurity management system.

3.2. PROTECTION OF PERSONAL DATA

DropsA protects and respects the personal rights of its employees and business partners. Compliance with the relevant regulations and laws, in particular on the processing of personal data, is ensured through appropriate measures.

3.3. IT SECURITY

At **DropsA**, the IT systems are designed according to a high standard of IT security. Company data, employee data and the data of business partners that are processed are optimally and legally protected by technical and organisational IT security measures. **DropsA** regards digitisation as a strategic necessity and is aware of the fact that cutting-edge IT technologies such as the cloud, artificial intelligence, the Internet of Things and digital twins offer multiple opportunities and potential.

3.4. PRIVACY AND DATA PROTECTION

Employees must keep confidential all information they become aware of in the course of their employment with **DropsA**.

3.5. SOCIAL MEDIA

Social media, such as Facebook, LinkedIn and X (ex Twitter), use online technology to enable people and companies to communicate easily via the Internet. In all our communications, including those via social media, we are required to keep customer-specific information confidential, to show respect for the diversity of people and colleagues we work with, and to maintain our corporate reputation. **DropsA** recognises that social media is an effective tool for sharing information and opinions with family, friends and communities around the world and that it facilitates work and business engagement.

However, using social media also entails certain risks and responsibilities. Social media platforms take many different forms, including but not limited to own or third-party blogs or micro blogs, e.g. X (ex Twitter), content communities (e.g. YouTube), social or professional networking sites (e.g. Facebook, LinkedIn), forums and discussion areas (e.g. Whirlpool, Google Groups), online encyclopaedias (e.g. Wikipedia), virtual game and social environments (e.g. World of Warcraft, Second Life).

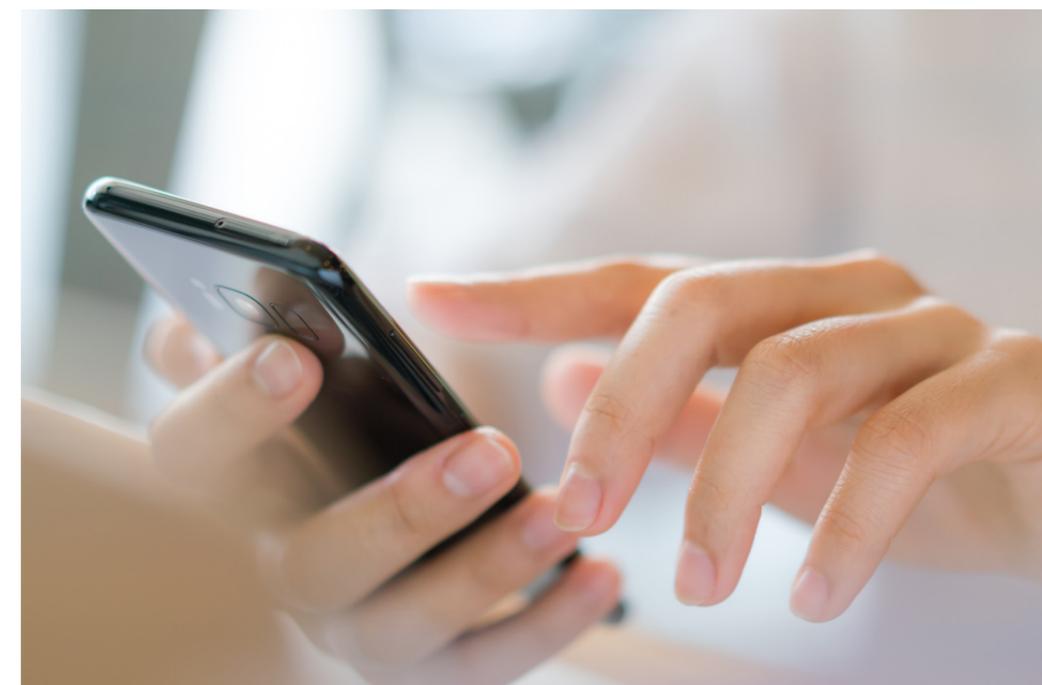
Employees must know what to communicate and how to communicate, both internally and externally.



It should be borne in mind that any conduct that adversely affects job performance, the performance of colleagues, or adversely affects customers, suppliers or persons working on behalf of **DropsA** or affiliated Companies may result in disciplinary action, possibly including dismissal. Online content is publicly accessible.

Remember that colleagues, customers and suppliers often have access to content posted online. As a good practice, **DropsA** recommends that employees configure privacy settings for personal social media pages or sites to the highest level of security.

- Maintain the confidentiality of DropsA's and its affiliated Companies' trade secrets and private information, and the confidential information of customers or suppliers.
- Trade secrets and private information may include information related to the development of processes, products, services, skills, know-how and technology, and financial results.
- Do not publish pricing, financial or operational information, internal reports, policies, procedures or other confidential internal business communications, including travel or business appointments, that are not otherwise in the public domain.
- Publishing the confidential information of customers or suppliers that is not in the public domain is prohibited.
- Comply with financial disclosure laws.
- It is illegal to communicate or provide "tips" about confidential information to others to enable them to buy or sell shares or securities, including through social media.
- Be transparent whenever a link is made from a blog, website or other social networking site to a DropsA (or affiliated Company) website, and you must identify yourself as an employee.
- Each person is personally responsible for the privacy and related security risks of his or her posts and other social media communications.
- Refrain from using social media during working hours or on Company-provided equipment, unless such use is work-related, in accordance with your Manager's authorisation or consistent with Company policies.
- Do not use Company e-mail addresses to register with social networks, blogs or other online tools used for personal purposes.



- Each employee is committed to protecting the Company's trade secret and private information, as described above, and confidential information belonging to customers and suppliers.
- If you have access to such information, ensure that it is not published on any social media site.
- Always be transparent and state that you are an employee if you publish information about the work you do or the products and services provided by **DropsA** (or its affiliated Companies).
- Remember that anything written on social media can go viral, whatever the privacy settings.
- Admit mistakes: if you realise you have violated this policy, notify management as soon as possible.
- Ensure that your personal social media pages maintain an adequate level of security.



DropsA's policy establishes our responsibilities, and the responsibilities of those who work for us, in relation to bribery and corruption. It provides information and guidance to those who work for us on how to recognise and deal with bribery and corruption issues. This policy applies to all people who work for us or on our behalf at all levels, including Managers, officers, agents, employees (permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and personnel of agencies, third party service providers, agents, sponsors or other persons associated with us, regardless of location.

We work in an honest and ethical way. Corrupt practices are not acceptable and we implement a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity and respect in all our business dealings and relationships, regardless of where we operate, and to implementing and enforcing effective systems to counter bribery.

We all respect this legal and regulatory framework in each country where we do business. We also expect those with whom we conduct business to implement a similar zero-tolerance approach to bribery and corruption.

Prior to entering into an agreement with a third party acting on **DropsA's** behalf, **DropsA** will perform proper and appropriate due diligence and obtain certain assurances of compliance from the third party.

4.1. FAIR WORKING CONDITIONS AND PROFESSIONAL DEVELOPMENT OF EMPLOYEES

DropsA is committed to the eight ILO core labour conventions, recognises the right of its employees to adequate remuneration and observes the minimum wages guaranteed by law in the respective labour markets. **DropsA** observes legal labour standards in all its Companies. **DropsA** observes the established maximum working hours and respects the employees' right to a certain minimum number of holidays. The Company expects its business partners (in particular agencies supplying temporary workers) to respect the right of their employees to fair remuneration and to follow **DropsA's** values and principles of conduct regarding the treatment of other persons. At **DropsA**, we focus our attention on our employees and their trustworthy cooperation. We regard the professional development of employees as an investment in the future of each individual and in the competitiveness of our Company. We offer a wide range of development and career possibilities that enable us and our employees to shape the future of **DropsA** together. Each employee thus has the opportunity to evolve according to his or her specific professional and personal skills and interests.

DropsA values and promotes continuous learning, i.e. learning from experience, from each other and through training in order to remain innovative and successful. Leadership plays a central role in this, namely reconciling the interests of the Company with the needs of the individual.

4.2. DIVERSITY AND PRINCIPLES OF EQUAL TREATMENT

DropsA is deeply committed to creating a respectful working environment that is free of discrimination and where diversity is seen as a factor for success. Everyone should feel valued, regardless of age, gender, gender identity, ethnic and social background, nationality, religion, outlook on the world, disability and sexual orientation. **DropsA** values multicultural experience and diversity and considers them strengths in its global organisation. We respect each other and are committed to creating a work environment where inclusion is actively practised and free from discrimination, intimidation and misconduct.

4.3. WORK AND FAMILY BALANCE

As a global family business, it is particularly important for **DropsA** to promote the best possible conditions for balancing family and work and to organise family-friendly life. Taking into account the specific needs of families, **DropsA** strives to increase the satisfaction and motivation of its employees and thus the efficiency of the Company. Cooperation based on trust and transparency forms the foundation for successful teamwork in the interest of the employee and the Company.

4.4. PROHIBITION OF FORCED LABOUR AND CHILD LABOUR

In its business activities, **DropsA** rejects any form of child labour, slave/forced labour, modern slavery, forced or exploitative prison labour, human trafficking and other forms of exploitation. **DropsA** expressly requests its business partners to do the same.

4.5. DIALOGUE WITH EMPLOYEES AND EMPLOYEE REPRESENTATIVES

DropsA observes the right of its employees to freedom of association and grants them the right to collective bargaining to regulate working conditions. With this in mind, **DropsA** works with employee representatives confidently and constructively. Irrespective of this right, **DropsA** always allows its employees to express their interests directly.

DropsA provides a safe working environment for its employees by complying with or exceeding the relevant legal requirements, regulations or active occupational health and safety guidelines. **DropsA** believes that occupational illnesses and work-related accidents can be fundamentally avoided. **DropsA** actively implements measures aimed at reducing the number and severity of occupational accidents. Furthermore, **DropsA** preserves and promotes the physical and psychological well-being of its employees. In particular, Managers are responsible for ensuring that appropriate health and safety precautions are taken.

Particular attention is given to employees with special protection needs, such as young people, pregnant women and people with physical disabilities.

5.1. ENVIRONMENTAL POLICY

One of **DropsA**'s shared values is to always act with integrity and respect for the community and environment in which we operate.

DropsA is committed to providing innovative, efficient and sustainable business solutions.

We ask all employees to take a proactive approach to managing environmental risks. Compliance with all laws and regulations regarding environmental protection (Environmental Regulations) is a minimum requirement.

DropsA confirms that its products comply with the requirements of the European Union Reach Regulation n. 1907/2006 and Directive 2011/65/EU (RoHS 2) and is committed to requiring compliance with these requirements from its suppliers.

In order to guarantee a high level of product safety to its customers, as well as to comply with legal requirements, **DropsA** constantly reviews the implementation of the REACH regulation in accordance with the updated list of candidate substances (<https://echa.europa.eu/it/candidate-list-table>), indicating via SCIP notification the possible presence of SVHC substances.

Attention to the environment is also pursued through constant familiarity with all the Environmental Regulations that regulate the individual operational areas:

- Continued improvement in raw material and energy utilisation;
- Reducing emissions and waste;
- Reducing noise and aesthetic decay of the external environment;
- Responsibly managing the appropriate containment, storage and disposal of waste and other potentially dangerous materials;
- Monitoring of gaseous emissions, wastewater and sewage spills.

In this context, **DropsA** is committed to the creation of an Integrated Quality and Environment System compliant with the requirements of the UNI EN ISO 9001:2015 standard and the UNI EN ISO 14001 standard, as well as following the guidelines of the UNI EN ISO 45001 standard for Health and Safety.



5.2. WHISTLEBLOWING

DropsA is sensitive to ethical and proper business conduct issues and complies with the 'whistleblowing' legislation.

This legislation was approved and introduced by Legislative Decree no. 24 of 10 March 2023, for the implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019.

The process of reporting wrongful or dangerous actions and near misses in the workplace that may violate the national provisions of the European Union and the adopted Code of Ethics are regulated through the IT platform <https://DropsA.integrityline.com>, therefore guaranteeing confidentiality and anonymity.

All **DropsA** employees and collaborators must feel free to report any actions incurred in the course of their work, or of which they have become aware or which could potentially have been foreseen and avoided.

Reports are received by **DropsA**'s Chief Executive Officer, pursuant to Legislative Decree 24/2023, and consequently HR and other responsible persons are designated to take remedial action.

Read more: <https://www.DropsA.com/en/about-us/whistleblowing>

6. BREACH OF THE CODE OF ETHICS

Violation of the Code's rules damages the relationship of trust established with the Company and, insofar as it is assessed as a breach of contractual obligations of the employment relationship or professional collaboration, pursuant to Article 2104 of the Italian Civil Code, may lead to disciplinary, legal or criminal action; in the most serious cases, the violation may lead to the termination of the employment relationship, if carried out by the employee, or to the interruption of the relationship, if carried out by a collaborator or third party (supplier, etc.). Other individuals involved in unlawful conduct may also be subject to disciplinary action.

This includes people who fail to use reasonable care to detect a violation, people who refuse to disclose information that could be relevant to an investigation, and supervisors who try, excuse, "look the other way" or retaliate. Breaches of this Code will be investigated on a case-by-case basis and will be dealt with in accordance with all applicable internal procedures, collective or union agreements and legal requirements.

Place and Date

DropsA S.p.A.

BREACH OF THE CODE OF ETHICS

Re: Acknowledgement and Acceptance of DropsA's Code of Ethics

Dear,

I hereby declare that I am aware of the principles contained in **DropsA's** Code of Ethics, attached hereto and published on the website: <https://www.DropsA.com/en/about-us/ethical-code>

Furthermore, I confirm that I agree with them, and will refrain from conduct contrary to them in the performance of the obligations assumed with the signing of this document. Any failure to comply with these principles may constitute breach of contract, entitling **DropsA** to terminate the existing contract between the parties, in accordance with Article 1453 of the Italian Civil Code, without prejudice to the right to compensation for any damages suffered by **DropsA** as a result of such breach.

Best regards,

DropsA S.p.A.

Legible signature

Name, Surname and Position of the Signing Party



- **DropsA** S.p.A. Italy - Headquarters
- **DropsA** BM Germany GmbH
- **DropsA** GmbH Germany
- **DropsA** UK LTD
- **DropsA** España S.L
- **DropsA** Lubrication Systems (Shanghai) Co. LTD
- **DropsA** Spicelube India PVT. LTD
- **DropsA** Middle East LLC
- **DropsA** Australia Pty.
- **DropsA** Autolube Western Canada
- **DropsA** USA & Canada East
- **DropsA** Argentina
- **DropsA** do Brasil IND. E COM. LTDA