

► GLOBAL LEGAL:

## CODE OF ETHICS

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## 1. INTRODUCTION

For **Corob S.p.A.** (hereinafter the “**Company**”) and for the **Corob Group companies** (hereinafter “**Corob**” or the “**Group**”), this **Code of Ethics** (the “**Code**”) serves as the charter of rights, responsibilities, and ethical standards that define the Group’s commitment to responsible and sustainable business conduct. It establishes the principles and behavioral criteria that guide all corporate activities and must be communicated to every individual or organization interacting with the Company—whether employees, contractors, customers, suppliers, or other stakeholders.

Given its importance, the Code applies to all persons who, in any capacity and in any country, engage with Corob or with any Group company, whether on an ongoing or occasional basis, for professional or commercial reasons.

The ethical principles set forth in this Code complement the legal and regulatory frameworks applicable in the countries where the Group operates, and—where relevant—integrate internal governance and compliance models adopted by the Group.

Accordingly, Corob requires that all corporate decisions and behaviors of its personnel be aligned with the ethical standards defined in this Code, even in jurisdictions where such principles may not be explicitly codified in local laws or regulations.

Under no circumstances may the belief that one is acting in the interest or to the advantage of Corob justify conduct that contravenes the principles expressed in this Code.

All individuals who collaborate with Corob in any capacity — including those working for subsidiaries to which this Code applies — are required to comply fully with its provisions.

Responsibility lies with **Directors, Senior Management, and Function Leaders**, as well as with members of the **Supervisory Body** (Organismo di Vigilanza, the “**ODV**”), who are entrusted with monitoring the implementation of the Code and ensuring its continuous updating. These individuals must actively promote compliance with the principles set out herein and act as role models for employees and all other collaborators.

The Code is made available not only to employees, Directors, Statutory Auditors, and the ODV, but also to customers, suppliers, partners, and all third parties who interact with Corob or other Group companies. Third parties who engage with Corob, particularly those receiving assignments or maintaining ongoing business relationships, are informed of the Code and encouraged to adhere to its principles and standards of conduct.



## 1.1. Mission

The Corob Group operates in the manufacturing and marketing of tinting machines designed for dispensing and mixing fluid colorant products used in the paint and industrial coatings industries.

The Group's mission is to ensure consistent excellence across all processes, adopting a sustainable approach to product development and providing its partners in the paints, coatings, and inks sectors with state-of-the-art equipment, software, and services.

This mission is expressed within Corob through a continuous focus on customer needs, a strong commitment to ongoing innovation, and a collaborative team culture in which all employees feel respected, valued, and empowered.

In Italy the ODV, as the internal supervisory body, plays a key role in promoting and overseeing adherence to these principles across all Group companies.

## 1.2. Recipients

This Code of Ethics applies to Corob S.p.A. and to all companies belonging to the Corob Group. Accordingly, it is binding upon:

Directors, Senior Executives, Managers, all individuals working within the Group, as well as contractors, consultants, suppliers, and customers (hereinafter collectively referred to as the “**Recipients**”).

To ensure that all Recipients adhere to the principles set out in this Code, the Company is committed to ensuring its broad dissemination and to facilitating its proper interpretation, with the aim of guaranteeing consistent application. For this purpose, the Code will be published on the Company's website and on the internal “My Corob” intranet, and a copy will be made available to all stakeholders who interact with the Company.

All identified Recipients have the right to access the document and, at the same time, the obligation to comply with all provisions contained herein.

Based on these premises, Corob reserves the right to apply the sanctions provided for in the event of serious and/or repeated violations, in accordance with applicable laws in the jurisdictions where the Group operates and with the provisions of this Code of Ethics.

For these reasons, once Recipients have been made aware of the content of this Code of Ethics, they are required to strictly comply with its provisions and avoid any conduct contrary to them. In case of doubts regarding interpretation, or to report potential violations by third parties who are likewise required to comply with the Code, Recipients shall contact their supervisors or—in Italy—the competent ODV.

To encourage compliance with the reporting obligation, supervisors and, in Italy, the ODV, are required to maintain confidentiality regarding the identity of the reporting individual.

Failure to comply with the reporting obligation may also result in disciplinary or contractual sanctions.



## 2. CODE EFFECTIVENESS

### 2.1. Effectiveness of the Code in relation to Employees, Collaborators, Managers, and Corporate Officers

Compliance with this Code of Ethics forms an integral part of the contractual obligations of Employees in the applicable jurisdictions. In particular, in Italy, this requirement is also relevant pursuant to Article 2104 of the Italian Civil Code.

A violation of this Code may therefore constitute a breach of contract and/or a disciplinary offense and may, where applicable, result in compensation for any damages suffered by the Company as a consequence of such violation, in accordance with applicable laws and collective agreements in force from time to time.

All Recipients are required to comply with the provisions of this Code in their internal interactions (with colleagues and supervisors) and in their external interactions (with customers, suppliers, partners, and other stakeholders). In particular:

I. Corporate Officers

In performing their governance and oversight functions, they must conduct themselves in accordance with the principles set out in this Code.

II. Managers and Function Leaders

Managers must conduct themselves consistently with the principles of this Code and ensure that Employees and Collaborators under their supervision do the same. Their behavior must serve as an example for others.

For the purposes of this Code, each Manager is responsible for coordinating and/or supervising the team members under their authority and for taking preventive action to avoid violations of the Code. Managers are therefore required to:

1. communicate clearly, accurately, and comprehensively to their team members the obligations that must be fulfilled, including the duty to comply with applicable laws and with this Code;
2. inform team members unequivocally that any violation of this Code may constitute a breach of contract and/or a disciplinary offense, in accordance with applicable laws, and may therefore be subject to sanctions;
3. promptly report to their direct supervisor or—in Italy—to the relevant ODV any observations or information received from their team regarding potential or actual violations of this Code by any Employee or Collaborator;

4. within the scope of their responsibilities, implement or promote appropriate measures to prevent the continuation of violations and to protect team members or any other Employee or Collaborator from retaliation.
- III. Employees and Collaborators  
Employees and Collaborators must conduct themselves in accordance with the principles set out in this Code and comply with the instructions communicated by their Managers.

To the extent necessary, Corob promotes the application of this Code to all Recipients by including in their respective contracts specific clauses that establish the obligation to comply with the provisions of this Code.

In Italy, the ODV oversees the implementation and enforcement of the above.

## 2.2. Effectiveness of the Code in relation to Third Parties

Any Recipient who interacts with third parties in the course of their duties must:

- I. inform the third party, where necessary, of the obligations established by this Code;
- II. require compliance with those provisions of the Code that directly relate to the activities of the third party;
- III. in the case of Employees or Collaborators, report to their Manager—and, in the case of Managers or Corporate Officers, report to the ODV—any conduct by third parties that is contrary to this Code or that could induce Recipients to violate its provisions.

The Group promotes the application of the fundamental principles set out in this Code, taking into account the legal, social, economic, and cultural frameworks applicable in each jurisdiction. Corob also promotes compliance with the provisions of this Code by third parties with whom it engages, including by incorporating into contractual frameworks and templates specific clauses requiring such third parties to comply, within their own activities and organizational structures, with the obligations established by this Code.

In Italy, the ODV oversees the implementation and enforcement of the above provisions.



## 3. FUNDAMENTAL ETHICAL PRINCIPLES FOR THE ORGANIZATION

The ethical principles listed below are considered fundamental. The Group is therefore committed to complying with them and ensuring that all individuals and entities—both internal and external—who maintain a relationship with the Group likewise respect them.

### 3.1. Compliance with Laws and Regulations

The Group operates in strict compliance with all applicable laws and regulations and ensures that all individuals acting on its behalf conduct themselves lawfully, regardless of the country, context, or type of activity involved. This commitment applies equally to consultants, suppliers, customers, and any third party interacting with Corob.

### 3.2. Integrity

Corob requires the highest standards of individual and corporate integrity. The actions and behavior of all Recipients must always reflect integrity, transparency, fairness, and honesty.

Each Recipient must contribute—through their conduct—to safeguarding these values and the reputation of Corob, both in and outside the workplace.

In performing their duties, Recipients must act with strong moral integrity, mindful of the social, economic, political, and cultural environments in which they operate, and must adhere to the following values:

- I. Honesty, fairness, and good faith, assuming full responsibility for their actions in relation to their role.
- II. Transparency, handling information promptly and ensuring clarity, completeness, accuracy, and appropriate sharing in all communications.

### 3.3. Dignity and Equality

Each Recipient must respect the dignity and personal rights of all individuals.

Recipients work with colleagues and partners from different nationalities, cultures, and backgrounds. Discrimination, harassment, or offensive conduct of any kind is not tolerated.



Corob is committed to avoiding discrimination based on age, gender, health status, ethnicity, nationality, political opinions, or religious beliefs in all aspects of its operations, including: customer relations, shareholder relations, personnel management, workplace organization, supplier selection, and all third-party interactions.

### 3.4. Selection, Development, and Training of Personnel

Corob recognizes that achieving its goals in a rapidly evolving world depends on talented, motivated, and loyal employees and collaborators, who represent a key strategic asset.

Accordingly, recruitment of highly skilled, entrepreneurial, and intellectually curious individuals must be accompanied by the creation and preservation of an inclusive, supportive work environment. Diversity—representing different experiences, perspectives, and personalities—is considered a source of cultural richness and innovation.

Corob is committed to respecting employee privacy, preventing any form of discrimination, and ensuring professional growth based solely on merit and competence.

Recruitment is conducted with impartiality and independence of judgment, based on transparent, verifiable criteria aligned with required skills and organizational needs, without discrimination of any kind.

Corob ensures that all employees receive appropriate training—whether classroom-based or on-the-job—to enhance their skills and motivation, recognizing that company growth depends on the development and well-being of all employees.

The protection of workers always takes precedence over economic considerations.

### 3.5. Selection of Suppliers and External Collaborators

Procurement and selection processes aim to maximize competitive value and provide equal opportunities to all suppliers meeting the necessary technical and quality requirements.

Decisions are made objectively, with the objective of delivering the best technical and economic solutions to customers. Pre-contractual and contractual relations must be based on fairness, transparency, and cooperation.

The principles that guide Corob's conduct apply equally to all suppliers and external collaborators. While seeking fair competitive advantage and equal opportunities, Corob requires reciprocal fairness and adherence to the behavioral standards described in this Code.



### 3.6. Professional Behaviour

Recipients must perform their duties with professionalism appropriate to their roles, applying maximum effort to achieving assigned objectives and diligently maintaining and updating their skills.

### 3.7. Health, Safety, and Environment

The environment is a primary asset that Corob is committed to protecting by complying with all applicable laws and monitoring the environmental impact of its activities to prevent associated risks.

Corob conducts its operations and investments responsibly and sustainably, with full respect for health, safety, and the environment.

Special attention is given to maintaining safe working conditions to protect the well-being of employees and any third parties who may interact with Corob facilities.

### 3.8. Fairness in Contractual Relations

Contracts and work assignments must be performed as agreed between the parties. Corob is committed to refraining from exploiting situations of hardship or weakness of any counterpart.

### 3.9. Competition

Corob is committed to fair competition and refrains from collusive, predatory, or abusive practices. No individual acting on behalf of the Group may participate in agreements that violate competition laws.

Recipients must comply with all applicable competition and antitrust regulations.

Corob defines its commercial policies independently and must avoid conduct that restricts market access or distorts competition.

The following are strictly prohibited:

- Agreements with competitors on prices, volumes, or contractual terms.
- Any form of non-competition agreement with competitors.
- Practices that limit production, market access, investment, or technological development.
- Market or supply-source allocation, including collusive participation in tenders.
- Applying different conditions to similar transactions in a way that distorts competition.
- Conditioning contracts on unrelated or unreasonable obligations.

Employees must report any potential violations to their Manager, and Managers and Corporate Officers must escalate concerns to the appropriate authorities.



Product and service sales must be based solely on their merits; the Code forbids making false statements about competitors.

Corob recognizes competition as essential for economic and social development and works to ensure free market access, equal opportunity, and informed decision-making.

Corob will not withhold, conceal, or delay information requested by Antitrust Authorities or Supervisory Bodies and will ensure full cooperation during regulatory proceedings.

### 3.10. Protection and Enhancement of Investment

Corob strives to achieve economic and financial results that safeguard and enhance company value, ensuring adequate return for shareholders.

The Group fosters conditions for informed participation of shareholders in corporate decisions.

### 3.11. Prohibition of Money Laundering and Self-Laundering

Corob complies with all national and international laws on anti-money laundering and tax transparency in the jurisdictions where it operates.

The Group ensures full traceability of financial transactions, including intra-group flows, and requires prior verification of the integrity and legitimacy of all business counterparts.

### 3.12. Confidentiality

All Recipients must maintain strict confidentiality regarding information acquired in the workplace, beyond what is necessary for their role.

Removal of internal documents—whether physical or electronic—without authorization is prohibited.

Particular care must be taken in handling confidential materials such as:

- strategic plans,
- project documentation,
- corporate performance data,
- financial results and forecasts,
- operational methods and strategies,
- investment-related information,
- personal data of employees or corporate officers,
- customer, supplier, and partner information.



Corob is committed to safeguarding all confidential information and ensuring compliance with applicable data protection laws.

Employees must not use or disclose personal data for non-business purposes.

Processing or communicating personal data without proper authorization—and requesting private information beyond lawful purposes—is strictly prohibited.



## 4. EXTERNAL RELATIONS

### 4.1 Gifts, Benefits, and Other Advantages

In performing their duties, Recipients are prohibited from offering or granting to third parties — as well as from accepting or receiving from third parties — directly or indirectly, including during holiday periods, any gifts, benefits, or other advantages (including money, goods, or services of any kind) that could influence, or create the appearance of influencing, business decisions in favor of any person with whom the Company has commercial relationships.

Only customary business courtesy practices — such as small gifts or hospitality — are permitted, provided they are of modest value (not exceeding EUR 100), do not affect the independence of the Recipient's judgment, and could not reasonably be perceived by an impartial observer as intended to obtain undue advantage.

Such expenses must always be authorized by the Chief Executive Officer and properly documented.

Employees are prohibited from accepting gifts or preferential treatment that go beyond ordinary courtesy.

Any Employee who receives an inappropriate gift must promptly inform their Manager so that it can be returned to the sender together with a written notice explaining the Company's policies as expressed in this Code.

Recipients are strictly prohibited from soliciting, requesting, or encouraging the offering, granting, acceptance, or receipt of gifts of any kind, even if of modest value.

Sponsorships, donations, and charitable contributions fall under the responsibility of Corob's corporate leadership, which prioritizes initiatives consistent with the Group's strategic objectives, offering reliable quality, conveying ethical values, and contributing to social development.

Any Recipient involved in negotiating or executing contracts must ensure that such contracts do not provide for or imply the granting of gifts in violation of this Code.

### 4.2 Relations with Customers

Customers represent a key asset for Corob.

The Group engages only with customers who respect fundamental principles and — considering their legal, social, economic, and cultural context — the standards established in this Code.



To strengthen customer trust and loyalty, Recipients must conduct their activities with legality, professionalism, and integrity, acting with competence, diligence, accuracy, dedication, fairness, and transparency.

Recipients are required to:

1. comply with Corob's procedures governing customer relations;
2. provide customers with accurate, complete, and clear information regarding Corob's products and services;
3. refrain from using false or misleading statements in the sale or marketing of products and services.

Promotional activities must be fair, accurate, and compliant with applicable laws. Statements must be objective and fact-based.

Information provided publicly, including advertising, must always be truthful and accurate. Comparisons with competitors' products or services must be balanced, accurate, and verifiable.

### 4.3. Relations with Suppliers

Corob enters into relationships only with suppliers who respect fundamental principles and — considering their legal, social, economic, and cultural context — the standards of this Code.

Corob pursues a fair and impartial selection of suppliers.

Recipients must adhere to the supplier qualification and selection procedures established by corporate policies, as well as any public procurement rules applicable under relevant laws.

Unless the engagement requires specific personal characteristics (*intuitus personae*), Recipients involved in procurement, supply, or service contracts must:

1. promptly report to their Manager — or, in the case of Managers or Corporate Officers, to the Chief Executive Officer — any personal interest that may create a conflict of interest;
2. ensure that competing suppliers are treated fairly and compared objectively according to transparent criteria, and that eligible suppliers are not excluded from opportunities;
3. accept invitations or hospitality from business counterparts only when appropriate in purpose and scope and when refusal would be inconsistent with normal professional courtesy.

Where Corob purchases semi-finished or finished products from third parties, it is prohibited to alter or falsify the origin of such materials or modify third-party trademarks.

If Corob intends to apply its own label to such products, this must be previously agreed in writing with the supplier. Exceptional cases will be assessed individually.



## 4.4. Relations with Business Partners

When participating in joint initiatives with other entities — whether through joint ventures or the acquisition of equity interests alongside other shareholders — Recipients must:

1. engage only with partners or shareholders of proven commercial reliability who adhere to ethical standards comparable to those of Corob and operate in line with this Code;
2. ensure transparency in all agreements and avoid signing undisclosed or unlawful arrangements;
3. promptly report to the relevant corporate function any behavior by the affiliated company, consortium, partner, or shareholder that appears to conflict with this Code.

## 4.5 Relations with Public Institutions and Authorities

### **PUBLIC INSTITUTIONS**

Relations with Public Institutions may be handled exclusively by authorized Corporate Officers or their delegates, in compliance with this Code, applicable governance documents, and all relevant laws and regulations.

Such interactions must be conducted with the utmost transparency and efficiency.

Recipients dealing with Public Institutions, directly or through third parties, must always:

1. act lawfully and in accordance with proper commercial conduct, strictly avoiding any behavior that could constitute an offense even if intended to benefit Corob;
2. refrain from attempting to improperly influence public officials or induce them to act contrary to their duties, including during negotiations or requests involving Public Administration representatives.

Recipients may not — directly or indirectly:

- offer employment or commercial opportunities for personal benefit of public officials;
- offer money, gifts, or improper benefits;
- exert undue pressure or promise advantages;
- submit false statements to public bodies to obtain subsidies, concessions, or authorizations;
- tamper with IT systems to obtain undue advantage;
- use funds received from public bodies for purposes other than those for which they were granted;



- request or obtain confidential information that would compromise the integrity or reputation of either party.

## **AUTHORITIES**

Corob fully complies with Antitrust and market-regulation laws.

It is strictly prohibited to conceal or delay information requested by regulatory authorities.

To guarantee transparency, Corob avoids situations that could create conflicts of interest with employees of regulatory authorities.

No employee or collaborator may disregard regulatory obligations under the assumption that doing so benefits the Group.

No one has the authority to issue instructions contradicting these principles.

## **4.6 Relations with Political and Trade Union Organizations**

Relations with political or trade union organizations may be handled only by authorized Corporate Officers or their delegates, in compliance with this Code, the Company's bylaws, and applicable laws, with particular regard to impartiality and independence.

## **4.7 Relations with the Media**

Relations with the press, television, and all forms of mass media — national or international — may be handled exclusively by authorized Corporate Officers or their delegates.

Any external communication must be previously authorized in accordance with corporate procedures in force.



## 5. HUMAN RESOURCES

### 5.1 Recruitment, Development, and Professional Training

Human resources represent a central element on which Corob relies to achieve its objectives. In recruiting and managing personnel, Corob applies criteria based on merit, competence, and the assessment of individual skills and potential.

Candidate evaluation is conducted by comparing expected profiles with company needs and ensuring equal opportunities for all applicants.

Information requested from candidates is strictly limited to verifying professional suitability, always respecting personal privacy and individual opinions.

Corob implements appropriate measures to prevent favoritism or undue advantages and promotes inclusive recruitment practices, encouraging a balanced representation of candidates for all roles.

### 5.2 Establishing the Employment Relationship

Personnel are hired under lawful employment contracts; no form of irregular work is tolerated.

Upon hiring, individuals are informed about:

- the nature of their role and responsibilities;
- applicable contractual and compensation terms;
- rules and procedures designed to prevent workplace risks.

Such information is communicated clearly so that acceptance of the role is based on full understanding.

When employing individuals without citizenship of the country where the work is performed, Corob ensures full compliance with applicable immigration and employment laws.

The Company verifies the validity of residence and work authorizations and prohibits the hiring of individuals without the legally required permits.

### 5.3 Personnel Management

People are Corob's primary asset. The Group promotes the professional development of each individual based on merit.

Corob is committed to safeguarding personal dignity and ensuring respectful working conditions.



Equal opportunities are guaranteed for all, and the Company actively promotes a culture of inclusion and respect for diversity.

Access to roles and responsibilities is based solely on competence and skills.

Performance evaluation involves managers as well as senior leadership to ensure fairness.

## 5.4 Integrity and Protection of Individuals

Corob protects workers from inappropriate or disrespectful behaviour and opposes any conduct that creates an adverse or hostile work environment.

The Company does not tolerate discriminatory behaviour of any kind.

All individuals must respect these principles and cooperate to uphold them.

Anyone who becomes aware of discriminatory conduct or believes they have been treated unfairly due to personal characteristics may report the situation to their hierarchical manager and, in Italy, to the ODV.

Such behaviour may result in disciplinary measures, up to and including termination.

Different treatments are not considered discriminatory if justified on objective grounds.

## 5.5 Development and Enhancement of Human Resources

Managers are expected to fully utilize and support the professional skills available within their teams, promoting development through practical learning opportunities.

Corob considers on-the-job training — including task rotation, mentorship, and assignments with increasing responsibility — particularly effective for professional growth.

Communication of performance and potential evaluations, as well as discussion of individual development plans, is considered essential.

## 5.6 Management of Working Time

Managers must respect employees' working time by assigning tasks aligned with their roles and workload plans.

It is an abuse of authority to request personal favours or behaviours inconsistent with this Code.



## 5.7 Employee Engagement

Employee involvement is encouraged through cross-functional meetings and participation in discussions aimed at achieving company objectives.

Employees are expected to participate constructively and independently, promoting initiative and continuous improvement.

Open communication and mutual trust enable managers to make informed decisions that reflect diverse perspectives.

## 5.8 Organizational Changes

In cases of organizational restructuring, Corob safeguards the value of human capital by implementing training and professional requalification where needed.

Restructuring follows these principles:

- impacts should be distributed as evenly as possible while maintaining efficiency;
- in unforeseen situations, individuals may be reassigned to new roles while respecting their professional competencies.

## 5.9 Health and Safety

Corob is committed to providing a safe and healthy work environment, promoting risk awareness and responsible conduct.

The Company focuses on prevention through technical and organizational measures, including:

- integrated risk and safety management systems;
- continuous risk assessment;
- adoption of appropriate technologies;
- updates to working methods;
- training and communication initiatives.

Employees must comply with all internal safety procedures and promptly report any issues or potential hazards.

Corob collaborates with Group entities, suppliers, contractors, and customers to enhance workplace safety.

Employees must:

- follow all safety protocols;
- comply with directives issued by prevention and safety functions;



- use equipment and protective devices responsibly;
- report safety concerns immediately;
- participate in required training and medical checks;
- respect company rules on smoke free areas;
- notify the safety manager and, in Italy, the ODV of any risks identified;
- cooperate transparently with supervisory authorities.

The consumption of substances that impair performance or safety is strictly prohibited during working hours, during breaks, and while traveling for business.

## 5.10 Equal Opportunities

Corob seeks to maintain a work environment free from discrimination of any kind and ensures equal opportunities under equal conditions.

All Recipients must contribute to this objective.

## 5.11 Work Environment

Recipients collaborate to achieve common goals and contribute to a respectful, positive, and professional work environment.

Conduct must be orderly, responsible, and consistent with Company values.

The Company does not tolerate inappropriate or disrespectful conduct in workplace interactions.

## 5.12 External Activities

Recipients may engage in outside activities only to the extent that such activities do not interfere with the performance of their duties on behalf of Corob.

Recipients must refrain from carrying out any outside activity—whether or not remunerated—that conflicts with the specific obligations they have undertaken toward Corob.

## 5.13 Use of Company Equipment and Facilities

Corob's corporate assets, including the equipment and machinery located in the workplace, may be used solely for business purposes and in accordance with applicable laws and internal regulations.



Under no circumstances may company assets—particularly IT and network resources—be used for purposes contrary to mandatory legal provisions, public order, or ethical standards, nor for committing or facilitating unlawful acts or any activities that promote discrimination, hostility, or violations of human rights.

Recipients are not permitted to make audiovisual, electronic, paper, or photographic recordings or reproductions of corporate documents, except where such activities fall within the normal performance of their assigned duties.

## 5.14 Alcohol, Controlled Substances, and Smoking

The use of drugs, as well as the consumption of alcoholic beverages, is prohibited in the workplace.

Without prejudice to applicable regulations governing smoking in the workplace, Corob will consider the needs of individuals who request to be protected from exposure to second-hand smoke at their workstations.



## 6. CONDUCT PRINCIPLES TO BE OBSERVED BY PERSONNEL

Employees, directors, and collaborators must adhere to the following principles in their conduct toward Corob.

### 6.1 Respect

Every individual has the right to a safe, calm, and respectful work environment that supports constructive interpersonal relationships and upholds the fundamental principles of inviolability, equality, freedom, and human dignity.

The Company recognizes and guarantees each employee's right to a workplace free from inappropriate, offensive, or hostile behavior of any kind, including moral pressure, psychological harassment, and any discriminatory conduct.

### 6.2 Diversity

Each person has unique strengths, and valuing these talents is essential to anticipating change, meeting market challenges, and achieving high performance.

Diversity is a driver of innovation. One of the Group's commitments is to support balanced representation within the organization. For this reason, Corob undertakes to ensure that qualified female candidates are considered for all positions—technical, administrative, managerial, and executive.

More broadly, Corob is committed to maintaining an inclusive work environment for all employees, irrespective of race, ethnicity, religion, personal beliefs, disability, age, or personal identity.

### 6.3 Professional Behavior

Each individual must carry out their work diligently, efficiently, and correctly, making proper use of available tools and time and assuming responsibility for the tasks assigned.

### 6.4 Loyalty

Relations with external parties, colleagues, and collaborators must be based on the utmost loyalty. This includes keeping commitments, acting responsibly, protecting and enhancing company assets, and applying good faith in all decisions and activities.



## 6.5 Honesty

Recipients must know and diligently comply with applicable laws. Under no circumstances may the pursuit of Corob's interest justify conduct that is not honest.

## 6.6 Fairness

Recipients must not use information, assets, or equipment made available to them for personal purposes unrelated to their roles.

No individual may accept or request undue influence, recommendations, or signals of favour that could harm Corob or create improper advantage for themselves or third parties. Likewise, no one may make promises of money or benefits.

## 6.7 Confidentiality

No confidential information related to Corob that is acquired or processed in the course of one's duties may be used, disclosed, or disseminated for purposes other than legitimate business needs.

Confidential information includes all data, knowledge, documents, reports, notes, studies, drawings, images, and any other material concerning company organization, assets, production methods, commercial and financial operations, research and development activities, and administrative or judicial proceedings involving Corob. The duty of confidentiality continues after termination of employment, in accordance with applicable laws.

Employees must:

- respect internal confidentiality obligations,
- access only documents they are authorized to view,
- use such documents solely for work purposes,
- prevent unauthorized disclosure by applying security measures and properly storing entrusted materials,
- avoid unnecessary copying of documents,
- ensure confidential material is kept in secure locations.

## 6.8 Protection of Personal Data

In conducting its activities, the Company processes personal data of Recipients and third parties.

Corob requires all Recipients, within the scope of their roles, to ensure that personal data is processed in accordance with all applicable laws at any given time.

Accordingly, personal data may be processed only by authorized personnel and in compliance with internal procedures aligned with relevant regulations.



## 7. ACCOUNTING AND INTERNAL CONTROLS

### 7.1. Accounting Records

Accounting transparency and the maintenance of accounting records in accordance with principles of truthfulness, completeness, clarity, accuracy, and compliance with applicable laws are fundamental prerequisites for effective control.

Adequate supporting documentation must be retained for every transaction to allow proper bookkeeping, reconstruction of the transaction, and identification of responsibilities.

All Recipients must ensure the accurate and timely recording of all management activities.

Recipients must also provide appropriate supporting documentation when submitting expense reports for reimbursement.

### 7.2 Internal Controls

The effectiveness and efficiency of a complex organization require proper functioning at every level. To ensure this, Corob has implemented an internal control system designed to verify and guide organizational processes.

Each Recipient, within the scope of their role and assigned responsibilities, is accountable for contributing to the definition and proper functioning of this control system.

### 7.3 Information Flows

Information must circulate according to principles of truthfulness, accuracy, and timeliness.

Accordingly, information communicated—whether internally (to colleagues, collaborators, shareholders) or externally (to customers, suppliers, institutions)—must be prepared carefully and in compliance with these principles.

Corob also fulfils all legal obligations, including disclosure requirements toward the competent authorities—particularly supervisory and regulatory bodies—and cooperates fully with them in carrying out their functions in accordance with applicable law.



## 8. CORPORATE POLICIES

### 8.1 Environmental Protection

Environmental protection and the preservation of natural resources are priority objectives for the Group. Corob and all employees act in accordance with applicable laws and regulations to protect the environment and reduce pollution.

Each Recipient must contribute to achieving exemplary results in this area through their daily activities.

The Company supports, through appropriate channels and through its industrial activities, the promotion of scientific and technological development aimed at environmental protection and conservation of natural resources.

### 8.2 Health and Safety della salute e sicurezza sui luoghi di lavoro

Each Recipient has a responsibility toward colleagues and collaborators, making risk prevention a fundamental duty.

The design of workplaces, equipment, and processes must meet the highest standards required by health and safety regulations.

Recipients must exercise maximum care in carrying out their duties and strictly observe all safety and prevention measures to avoid any possible risks to themselves and others.

### 8.3 Intellectual Property and New Product Development

Protecting Corob's intellectual property—including patents, trade secrets, trademarks, distinctive signs, technical and scientific know-how, and expertise gained through business operations—is essential to maintaining the Group's competitive advantage.

Employees are required to identify, protect, maintain, and defend Corob's intellectual property rights and exercise such rights responsibly.

In addition to safeguarding the Company's intellectual property, the rights of third parties must also be respected.



## 8.4 Copyright

Many materials used by directors, officers, employees, and representatives in the course of their work are protected by copyright laws.

Reproduction, distribution, or modification of copyrighted materials without permission from the rights holder is illegal and prohibited under this Code, except where legal exemptions (such as fair use) apply.

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No director, officer, employee, or representative may copy or install software on multiple devices unless expressly permitted by the relevant license or applicable legal exemptions.

## 8.5 Social Responsibility

Social responsibility is a core value recognized and shared throughout the Group, both domestically and internationally.

The Company conducts its activities in compliance with its social and ethical commitments and aims to contribute positively to the economic, intellectual, and social development of the communities and countries in which it operates.

## 9. ADOPTION OF THE GRACO INC. CODE OF ETHICS

### 9.1 Application of the Code of Ethics within the Group

This Code of Ethics serves as the ethical and behavioural reference framework for the entire Group and is recognized by all Group companies, regardless of the country in which they operate.

Each company applies this Code to the extent compatible with its national legal system and the applicable regulations on labour, safety, environmental protection, anti-corruption, privacy, and all other relevant areas.

### 9.2 Adoption of the Graco Inc. Code of Ethics and Business Conduct

Following the acquisition completed on November 4, 2024, the Group has formally adopted the **Graco Inc. Code of Ethics and Business Conduct**, including future updates, recognizing its principles as an integral part of the Group's value system.

The Graco **Code of Ethics and Business Conduct** therefore applies:

- to all Group companies;
- to the extent compatible with the present Group Code of Ethics and with the national legal framework of the jurisdictions in which the Group operates.

The updated document is available on the Graco Inc. website at:

<https://www.graco.com/it/it/about-graco/ethics/code-of-ethics-and-business-conduct.html>

and on the Corob corporate intranet, in the section dedicated to ethical and compliance documentation.

### 9.3 Requests for Clarification and Reporting of Potential Violations

Nessun Codice Etico può prevedere tutte le situazioni che possono verificarsi nella vita aziendale.

No Code of Ethics can anticipate every possible situation that may arise in corporate life.

For this reason, all employees and collaborators of the Corob Group are encouraged to seek clarification whenever they have doubts about the interpretation or application of this Code.

When needed, individuals may:



- discuss the matter with their Manager;
- contact the local Human Resources office for guidance and support;
- contact the Group Legal Counsel for matters requiring legal or compliance assessment.

In Group companies where an ODV is not established, these local functions play an essential role in managing requests for clarification and reports.

## 10. MODEL 231 – ITALY-SPECIFIC SECTION

### 10.1 General Provisions

This Code forms an integral part of the Organization, Management and Control Model required under Legislative Decree 231/2001 and is adopted by the Company's Board of Directors.

To ensure compliance with the principles of this Code, the Company guarantees:

- I. the broadest dissemination and accessibility of this Code;
- II. uniform interpretation and application;
- III. verification of reported violations and application of sanctions in accordance with applicable laws;
- IV. prevention and prohibition of any form of retaliation against individuals contributing to the implementation of this Code;
- V. periodic updates to the Code based on evolving needs and regulatory developments.

### 10.2 The ODV under Article 6 of Legislative Decree 231/2001

All Company stakeholders may report, in writing and non-anonymously, any violation or suspected violation of the Code of Ethics to the following email address: [odv@corob.com](mailto:odv@corob.com).

The ODV will review the report and may, where appropriate, hear from the reporting person and the individual involved.

The ODV is responsible for:

- periodically verifying the application and compliance with the Code;
- reviewing the content of the Code and proposing updates based on legislative developments;
- promoting dissemination of the Code;
- proposing amendments and integrations to the Board of Directors;
- receiving reports of violations and conducting related investigations;
- supporting individuals who report concerns, ensuring they are protected from undue pressure or retaliation;
- preparing an annual report on its activities for the Board of Directors.

Revisions to the Code are approved by the Board of Directors upon proposal by the Chairman or the Chief Executive Officer, taking into account stakeholder feedback and reporting on the Code's effectiveness and any identified gaps.



## 10.3 Clarifications, Complaints, and Reports

All Corob employees and collaborators must cooperate with the ODV, including by providing any corporate documentation necessary for its activities.

If a Recipient is uncertain about the legality, ethical implications, or alignment with the Code of a specific behaviour, they may consult their Manager and/or the ODV.

Reports of potential violations must be submitted in writing and may be addressed to the ODV via email at **odv@corob.com**, in addition to the hierarchical reporting line.

Reports concerning potential misconduct by the ODV should be addressed to the Board of Directors, which will designate one of its members to conduct appropriate investigations.

All reports will be handled with the utmost confidentiality.



## DOCUMENT VERSION

*This Code was approved by the Board of Directors of COROB S.p.A. on March 31, 2026.*

*Any amendments or integrations to this Code will be approved by the Board of Directors upon proposal by the General Manager and/or the Chairperson (acting jointly or individually), after consultation with the Board of Statutory Auditors and the Supervisory Body, and will be promptly communicated to all Recipients.*

VERSION NO.	DATE	DOCUMENT NAME	ISSUING FUNCTION
VER. 01	31.03.2017	CODICE DI COMPORTAMENTO	BOARD OF DIRECTORS
VER. 02	09.02.2023	CODICE ETICO	BOARD OF DIRECTORS
VER. 03	31.03.2026	CODICE ETICO	BOARD OF DIRECTORS