



GARDA SPORTING SRL is committed to pursuing sustainability in all its forms. For this reason, it has decided to adopt a code of ethics, which guides all its activities.

Below are the fundamental principles of our code that derive from the 10 Principles of the UN Global Compact.

HUMAN RIGHTS

- 1 Our structure respects human rights and employees are encouraged to report issues.
- 2 The exploitation of human beings in any form, and in particular sexual exploitation, especially of children, is contrary to the fundamental objectives of tourism and constitutes the negation of the same. As such, in accordance with international law, it is rigorously fought.
- 3 Our structure rejects all forms of forced labor and the confiscation of the employee's original or similar identity documents. Workers are granted free movement.
- 4 Child labor is never permitted. The minimum age of employees is 16 or 15 in the context of school-work alternation projects. Employees under the age of 18 cannot work the night shift or perform risky or heavy work.
- 5 Our structure ensures that no Employee is discriminated against or mistreated because of gender, nationality, sexual identity, skin color, ethnicity or religious belief, disability or sexual orientation. Diversity and equal opportunities are encouraged, including in career advancement.
- 6 No one may be subjected to corporal punishment, unlawful deprivation of liberty or physical, sexual, psychological or verbal abuse. Wage deductions used as a disciplinary measure are not permitted.
- 7 Our structure respects the freedom of association of all Employees and their right to collective bargaining. All workers have full freedom to join a union and to appoint representatives to express their professional interests without fear of punishment, persecution or other forms of retaliation.

WORKING CONDITIONS

1. A written contract is stipulated for each employee, regardless of whether the employment relationship is temporary or permanent. The written contract contains at least information on working hours, notice period, salary, salary range and overtime compensation.
2. All employees receive a fair wage that covers a reasonable standard of living for the employee. This standard of living includes food, clothing, housing, medical care, social services and insurance. Overtime compensation is paid.
3. All employees receive a pay slip showing their salary and any legal deductions, as well as overtime compensation, if applicable.
4. The number of hours worked and hours of rest comply with national regulations.
5. All employees are entitled to holiday pay, sick pay and paid parental leave.
6. Our facility creates a safe and healthy work environment. Injuries and accidents are recorded, reduced and prevented.
7. All employees have access to clean drinking water, toilet facilities and a separate place for meals.
8. Hazardous work is documented and our facility pays for and provides Employees with appropriate protective equipment. All surfaces are well lit, ventilated and maintained at an acceptable temperature and noise level.
9. If accommodation is provided, each Employee is provided with a suitable and clean bed with separate sleeping areas, toilets and showers for men and women.
10. Our facility has satisfactory fire safety and evacuation procedures. All sites are equipped with fire alarms, fire extinguishers and clearly marked and easily accessible evacuation routes and emergency exits. Fire drills are carried out regularly.
11. All products and services provided comply with all legal standards for consumer health and safety. Our facility provides clear information on the content, safe use, maintenance, storage and disposal of products and services.

ENVIRONMENT

1. Our facility is committed to reducing its impact on the environment and public health and safety.
2. Partner is committed to undertaking an environmental sustainability program with measurable goals to improve environmental, public health and safety levels. The program includes information on the management of chemicals and hazardous materials, waste management, energy use, water use, transportation and travel, and emissions to air, water and soil.
3. Our facility has a risk management plan that prevents, reduces and controls serious harm to the environment.
4. Suppliers of products containing conflict minerals such as tin, tungsten, tantalum and/or gold are required to have a policy and procedure that ensures the traceability of these minerals.

ANTI-CORRUPTION

5. Corruption in all its forms, including but not limited to extortion, bribery, nepotism, fraud, money laundering, are strictly prohibited.
6. No one may offer, promise, give or accept, directly or indirectly, any payment, gift or benefit in exchange for special treatment with the intent to promote a sale or receive a personal or commercial advantage.
7. Our structure rejects any form of aiding and abetting of mafia associations and respects the Code of Anti-Mafia Laws and Prevention Measures.
8. All potential conflicts of interest are avoided. Business decisions are not influenced by personal relationships and/or interests.
9. Fair competition is respected. Market sharing, bid manipulation and production restrictions are strictly prohibited.
10. Our structure respects anti-corruption laws. The adoption and reporting of internal control measures is encouraged.
11. Our structure is committed to being transparent. Systems that guarantee precise, regular, reliable and pertinent information regarding the Partner's activities, structure, financial situation and business transactions are encouraged.

Collaborators and guests are encouraged to report any problems to management. Any incidents attributable to the above-mentioned cases will be punished with the application of the law and with the exclusion of the collaborator.

I, the undersigned **EGON TRETTER** as legal representative of **GARDA SPORTING SRL** approve the Code of Ethics.

Riva del Garda, February 13th, 2025


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