TIERRA

Code of Conduct

Tierra's Ethics and Business Conduct Code

Foreword

This Code of Conduct expresses Tierra S.p.A.'s commitment to operate with integrity, responsibility, transparency, and respect for people.
The Code applies to directors, officers, employees, collaborators, consultants and, where relevant, to business partners, suppliers and third parties acting on behalf of Tierra.
In line with company policies and principles, it defines a framework for adopting correct, aware, and consistent behaviors in daily activities.

1. Purpose, scope of application and responsibilities

This Code aims to define clear standards of behavior and support decisions consistent with company values, applicable regulations, and the legitimate expectations of stakeholders.

All recipients are required to comply with the Code, applicable laws, internal policies, and contractual obligations. Function managers and leaders must promote a culture of example, ensure adequate knowledge of the Code, and support its effective implementation in daily activities.

When a situation is not expressly regulated, everyone is required to act with common sense, professional integrity, transparency, and a sense of responsibility.

2. Human rights, dignity of the person and inclusion

Tierra recognizes and respects internationally recognized human rights and promotes a working environment based on dignity, listening, and mutual respect.

The company does not tolerate discrimination, harassment, intimidation, verbal or physical abuse, or behaviors that undermine personal dignity. Respect applies in every professional relationship, including interactions with colleagues, candidates, customers, suppliers, visitors, and partners.

Tierra promotes equal opportunities, inclusion, enhancement of skills, and collaboration among people with different experiences, cultures, ages, and perspectives.

3. Decent work and protection of employment conditions

Tierra rejects any form of forced labor, exploitation, human trafficking, servitude, coercion, or child labor and is committed to preventing such risks also along its value chain.

The company recognizes the right to freedom of association and collective bargaining in compliance with applicable regulations.

Tierra is committed to ensuring fair working conditions, equitable compensation, compliant management of working hours, and respect for fundamental human rights.

4. Health, safety and well-being at work

Health and safety are essential priorities. Tierra promotes safe, healthy, and organized workplaces, adopts prevention and protection measures, and requires compliance with company procedures and applicable regulations.

Each individual is expected to actively contribute to risk prevention, promptly report dangerous situations, and correctly use tools, equipment, and company spaces.

Tierra also promotes a work environment that respects the balance between professional and personal life, in line with organizational and operational needs.

5. Integrity, legality and fairness in business

Tierra operates fairly, honestly, and transparently in all markets in which it operates. Corruption,

improper payments, fraud, extortion, favoritism, collusive practices, money laundering, terrorism financing, and any conduct contrary to law or fair business principles are prohibited.

No one may offer, promise, authorize, solicit, or accept money, gifts, hospitality, or other benefits when such advantages may influence, even in appearance, the impartiality of a business decision.

Relationships with customers, business partners, suppliers, public authorities, and third parties must be managed with documentary transparency, traceability, and full compliance with applicable laws on competition, anti-corruption, and international trade.

6. Conflicts of interest and proper use of one's role

All recipients of the Code must avoid situations where personal, family, financial, or professional interests may interfere, or appear to interfere, with Tierra's interests.

Any potential conflict of interest must be promptly disclosed through the appropriate company channels to allow an impartial assessment and the adoption of necessary measures.

The use of one's role, information, or company relationships to obtain personal or third-party advantages is contrary to the principles of this Code.

7. Quality, product safety and customer focus

Tierra is committed to designing, developing, delivering, and supporting reliable and safe products and services, compliant with contractual and regulatory requirements and aligned with applicable quality and safety standards.

Customer satisfaction requires technical rigor, clarity in communication, listening capability, and responsible risk management throughout the entire lifecycle of products and services.

Any potential issue related to quality, safety, compliance, or reliability must be promptly reported and managed in accordance with management systems and company procedures.

8. Information, confidentiality, privacy and cybersecurity

Company, technical, commercial, and personal information represent assets to be protected. Tierra safeguards confidentiality, intellectual property, personal data, and digital systems in compliance with applicable laws and company policies.

Company assets, both tangible and intangible—including devices, software, networks, accounts, documents, data, and know-how—must be used responsibly, securely, and only for legitimate and authorized purposes.

Each individual is required to adopt diligent behavior in cybersecurity, prevention of unauthorized access, protection of credentials, document management, and reporting of incidents or vulnerabilities.

9. Responsible use of digital technologies and artificial intelligence

Tierra promotes responsible, secure, and proportionate use of digital technologies and artificial

intelligence tools, in line with fundamental rights, data protection, information security, and process reliability.

Digital and AI tools must not be used to bypass controls, generate misleading, discriminatory, or harmful content, compromise confidentiality, violate third-party rights, or make inappropriate decisions without adequate human oversight.

Where used, digital and AI solutions must be managed with attention to data quality, security, traceability, accountability, bias prevention, and evaluation of potential impacts on people, customers, and partners.

10. Communication, marketing and use of social media

Tierra's external communication must be truthful, accurate, verifiable, and consistent with the company's identity and reputation.

Marketing, promotional, and public relations activities must avoid misleading, defamatory, discriminatory messages or those not respectful of personal dignity and cultural differences.

When using social media or other public channels, recipients of the Code must act with caution, avoiding improper disclosures, unauthorized statements, or behaviors that could harm the company or others.

11. Suppliers, partners and value chain

Tierra selects and manages suppliers and partners based on objective and transparent criteria, considering quality, reliability, safety, integrity, sustainability, and regulatory compliance.

The company expects suppliers, contractors, consultants, and partners to adopt ethical standards consistent with those expressed in this Code and to promote them, where possible, also within their own supply chains.

Tierra reserves the right to verify compliance with these principles and to adopt corrective measures or terminate relationships in case of serious or repeated violations.

12. Environment, community and social responsibility

Tierra operates with attention to the environmental impact of its activities and promotes an approach based on prevention, continuous improvement, responsible use of resources, waste reduction, and compliance with applicable environmental regulations.

The company encourages behaviors consistent with sustainable growth, protection of communities, and responsible corporate presence in the social context in which it operates.

Donations, sponsorships, contributions, and representation initiatives must be managed with transparency, consistency with company values, and full compliance with applicable rules.

13. Reporting, whistleblowing and non-retaliation

Tierra encourages reporting, in good faith, of conduct contrary to the law, this Code, or company policies.

Reports must be made through appropriate and confidential channels and, where applicable, in compliance with whistleblowing regulations. The company protects the confidentiality of the reporting person and all involved parties, in accordance with legal guarantees.

Tierra does not tolerate retaliation, discrimination, or penalties against anyone who makes a report in good faith or cooperates in an investigation.

14. Implementation, controls and consequences of violations

Compliance with the Code is an integral part of how Tierra operates. The company promotes awareness, communication, and, where appropriate, training on the contents of this document.

Violations of the Code are assessed with seriousness, impartiality, and proportionality and may result in corrective, disciplinary, contractual, or legal measures, depending on the nature of the relationship and the severity of the conduct.

This Code may be updated over time to reflect regulatory, organizational, technological, and social developments.

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