



# CODE OF CONDUCT



# "Our commitment to play by the rules. Always."



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## Respect, fairness, and accountability

In over thirty years of business, we have learned that in life—as in sports—it's not only about winning: what truly matters is how you play the game

That's why today we present the first Code of Conduct of Advanced Distribution S.p.A.: a written declaration of our business vision, built on respect, transparency, fairness, and accountability. This is not merely a list of rules, but a values-based guide designed to reinforce what already defines us: trust, integrity, and the will to act ethically toward people, environment, and the communities we engage with.

We have built lasting relationships with major brands, customers, and suppliers. We have invested in employee wellbeing and embraced the social value of sport. This Code formalizes what is already in our DNA: playing fair—on and off the field.

Each of us—from the Board of Directors to every employee, from our agents to business partners—is responsible for embodying and upholding these principles in every decision, every day. We build our reputation day by day, act by act, word by word.

### **Gianni Lanfranco**

Chairman of the Board of Directors,  
AD S.p.A.

## Our Commitment

# Our goals

### Our successful game plan

Advanced Distribution believes in sport as a driver of positive change. For this reason, all actions within AD must reflect the values taught by sports: respect, transparency, inclusion, determination, and integrity.

This Code of Conduct acts as a guide for ethical and responsible behaviour. It is not just a document – it is the successful game plan for the entire Group.



## 01. Core Values

The leading values of AD S.p.A. are:

### **Ethics and integrity**

always act with fairness, transparency, and in accordance with the rules.

### **Flexibility**

the ability to adapt and comply to the needs of partners, customers and colleagues.

### **Teamwork**

promotion of collaboration, sharing and harmony among colleagues and partners.

### **Determination and resilience**

willingness to face challenges with strong effort, learning by difficulties.

### **Credibility**

reliability in promises and consistency in actions.

### **Sustainability**

commitment to generating a positive impact on environment, people, and communities.

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### Reliability in relationships

All those working with AD S.p.A. are required to share and uphold the company's values with integrity and consistency.

Adopting and complying with the Code — through the acknowledgement and signing the appropriate documentation — is a prerequisite for establishing or keeping on any type of relationship with AD S.p.A.

## 02. Scope of Application

The Code applies to:

**All members of  
the Board of  
Directors**

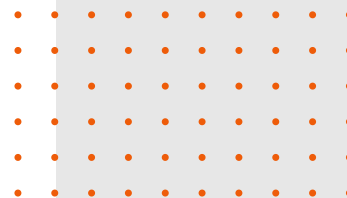
**All employees  
and collaborators  
at any level**

**Suppliers, agents,  
consultants,  
business partners**



## Our Commitment

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## 03. Business Integrity



### Corruption and Conflicts of Interest

Any form of corruption, bribery, or unlawful benefit is strictly prohibited. Gifts, hospitality, and invitations must be proportionate, transparent and justified by legitimate business purposes.

Actual or potential conflicts of interest, including personal or professional relationships that may influence decision-making, must be avoided or properly managed.



### Unfair Competition

AD S.p.A. complies with all regulations protecting fair competition and rejecting all anti-competitive practices, including price fixing or collusion on market conditions.

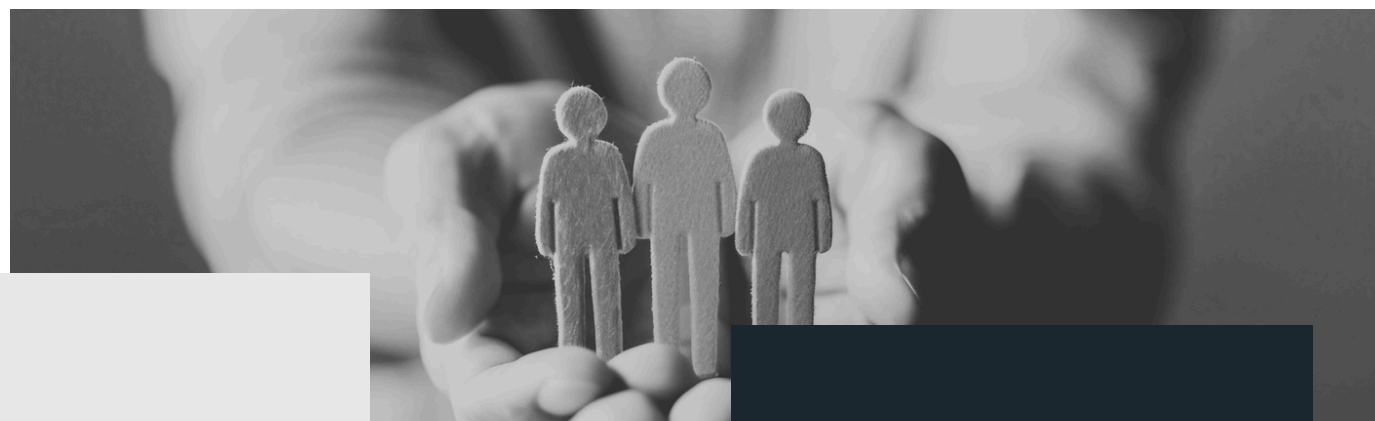
The company's competitiveness is based on quality, reputation, and transparency – not on shortcuts.



### Relations with Public Institutions

Interactions with public institutions and officials must be conducted with transparency, fairness, and full legal compliance. Favouritism or undue influence is not permitted.

## 04. Internal Relations Integrity



### Respect for Human Dignity

All employees must be treated with dignity and respect, regardless of individual characteristics (gender, age, ethnicity, religion, sexual orientation, etc.).

### Promotion of a Safety Culture

The company is committed to risk prevention, workplace risk assessment, and the dissemination of appropriate information and training.

**01**

### Respect and Inclusion

AD S.p.A. promotes an inclusive and empowering work environment where everyone can express their potential. All forms of discrimination, harassment, or exclusion based on gender, ethnicity, age, sexual orientation, disability, or other personal factors are strictly prohibited.

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### Health, Safety, and Wellbeing

AD S.p.A. ensures a safe working environment that complies with current regulations and prioritizes the physical and psychological wellbeing of its workforce. Safety is a shared responsibility; any hazardous condition must be reported promptly.

## 05. Integrity in Information Management



### Accuracy and Transparency

All data, documents, and records must be drafted accurately, comprehensively, and in a timely manner. It is forbidden to alter, omit, or falsify any information relevant to business, legal, or accounting purposes.

Use personal data only for authorized purposes and within the scope of their duties.

Ensure that personal data is not disclosed to unauthorized internal or external parties.

### Confidentiality and Data Protection

AD S.p.A. protects the confidentiality of information and personal data of employees, clients, and partners, in accordance with applicable regulations (in particular, EU Regulation 2016/679 – GDPR). All processing must be carried out in a lawful, correct and transparent way.

Specifically, AD S.p.A. employees must:

Consult the Privacy & Security Officer in case of doubt about proper data handling.

Immediately report any known or suspected unauthorized use or disclosure of personal data.



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## 06. Environment, Community and Sustainability

### Environmental Responsibility

AD S.p.A. is committed to reducing its environmental footprint through:

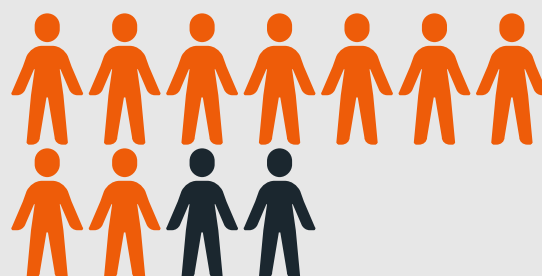
- Energy efficiency of buildings and smart management of energy consumption.
- Renewable energy production via its own photovoltaic system.
- Document digitization and dematerialization.
- Waste reduction and recycling initiatives.

The company prioritizes suppliers and partners who apply environmental criteria and promotes a sustainability-oriented culture throughout its value chain.

### Commitment to Sustainability

In 2025, AD S.p.A. published its first Sustainability Report, referring to the 2024 fiscal year. This shows a concrete step toward responsible and transparent management and the formal integration of ESG (Environmental, Social, and Governance) criteria into its strategies and processes.

Sustainability is recognized as both a competitive driver and an ethical duty toward future generations, local territories, and all stakeholders. This commitment is reflected in measurable, ongoing actions.



### Community Engagement

Social responsibility is a founding value for AD S.p.A. The company actively supports projects promoting inclusion, education, and wellbeing, with a strong focus on sports initiatives. These efforts are a tangible expression of the company's mission to create shared value for people and communities.



## 07. Whistleblowing and Protection of Violations Reporters



Every employee or collaborator is encouraged to report, in good faith, any conduct inconsistent with this Code. Reports can be submitted through secure channels and will be handled confidentially, without risk of retaliation.

To report violations or potential violations of the Code, AD S.p.A. encourages one of the following actions:

**AD S.p.A. enforces a zero-tolerance policy against retaliation and promotes a culture of transparency and accountability.**



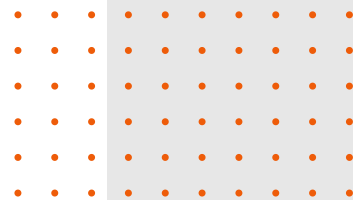
**1) Speak with your supervisor.**



**2) Email the Compliance Team at:**  
**[c.maldie@advanced-distribution.com](mailto:c.maldie@advanced-distribution.com)**



**3) Submit an anonymous report through the platform:**  
**<https://www.anticorruzione.it/-/whistleblowing>**



## **08. Violations and Sanctions**

Non-compliance with this Code of Conduct constitutes a disciplinary offense and may result in sanctions up to and including termination of employment or collaboration contract, in accordance with applicable laws and contracts.



## **09. Approval and Updates**

This Code of Conduct was approved by the shareholders' meeting of AD S.p.A., which met on 05/21/2025 to discuss and decide on its adoption. The document is subject to periodic review based on the regulatory, organizational and strategic evolution of the Company.



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It doesn't matter whether the referee is watching or not.

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We always play by the rules.

## Attachments

- Form “A” – Declaration of Acknowledgment and Acceptance of the Code of Conduct

If you have any questions about the applicability of any part of the Code of Conduct or how it may impact your actions, you are invited to get in touch with our Compliance Team through the following channels.

Our Compliance Team is at your service.



phone  
**011 8005901**



e-mail  
**c.maldieadvanced-distribution.com**



address  
**Via Peano 70 - 10040 Leinì (TO) - Italy**