



CASAPPA S.P.A.

Organization, Management and Control Model

Pursuant to Legislative Decree 231/2001

Annex 2 – Code of Ethics

Table of Contents

ANNEX 2 – CODE OF ETHICS	1
<i>FOREWORD.....</i>	<i>3</i>
<i>1. Scope and target audience</i>	<i>4</i>
<i>2. Obligations of employees and collaborators</i>	<i>6</i>
<i>3. Ethical principles</i>	<i>8</i>
<i>4. Rules of conduct.....</i>	<i>14</i>
<i>5. Violations and sanctioning consequences</i>	<i>28</i>
<i>6. Approval of the Code of Ethics and related amendments</i>	<i>29</i>

FOREWORD

Casappa S.p.A. (hereinafter also the “Company”) is committed to ensuring the utmost fairness in the conduct of its business and related activities. To protect its image and reputation, it has chosen to comply with the provisions of Legislative Decree No. 231 of 8 June 2001 (hereinafter also the “Decree”), which introduced into the Italian legal system the administrative liability of entities for certain criminal offences committed by persons who, within the entity, hold representative, administrative or management functions, or by persons subject to the direction or supervision of the former.

In light of the compliance with this legislation, it was considered that the adoption of a Code of Ethics, which clearly and transparently sets out the set of values by which the Company is inspired in achieving its business objectives, is of central importance for the proper performance of the related activities and constitutes, at the same time, a valid tool for supporting and completing the process of compliance with the provisions of the Decree.

The Company also recognises that legality, integrity of conduct, respect for the person and environmental and social responsibility are essential prerequisites for the sustainable development of business activities and for the creation of value in the medium to long term.

In carrying out its activities, Casappa S.p.A. operates in compliance with applicable national and international legislation and is inspired by the main international standards on human rights and corporate social responsibility, including the United Nations Guiding Principles on Business and Human Rights (UNGP), the fundamental Conventions of the International Labour Organization (ILO) and the OECD Guidelines for Multinational Enterprises.

This Code of Ethics therefore integrates, in addition to the safeguards for the prevention of relevant crimes pursuant to the Decree, also the Company's reference principles in environmental, social and governance (ESG) matters, promoting their integration into decision-making and management processes.

That said, this document (hereinafter the "Code of Ethics") has been formally adopted on the assumption that compliance with it is an essential condition for the proper functioning of the

Company, for the protection of its reliability and reputation, and for increasing customer satisfaction, factors that contribute together to the success and current and future development of the Company.

The Company promotes compliance with the principles contained in this Code also in relations with customers, suppliers, business partners and, more generally, with the subjects operating along its value chain, in the awareness that conduct based on fairness, transparency and responsibility represent an essential element of reliability in national and international markets.

The Company requires that the parties operating along the supply chain ensure compliance with the technical, environmental and safety regulations applicable to the products and services supplied, ensuring the traceability of relevant information and full cooperation in the verification and control processes.

1. Scope and target audience

The Company bases all actions, operations, relationships and transactions carried out in the management of the various corporate activities on the principles of this Code of Ethics, subsequently identified.

This Code of Ethics sets out the guiding principles that govern the Company's business activities and is binding on all persons who hold representative, administrative or management functions, or who otherwise (including de facto) exercise management and control, as well as on all Employees, Collaborators (including, without limitation, consultants, statutory auditors, etc.) and, more generally, on any person or entity having business relations with the Company (hereinafter the "Recipients").

The Company undertakes to promote knowledge of and compliance with the principles of this Code also with regard to the subjects operating along its value chain, including suppliers, business partners and other economic interlocutors, requiring that the related conduct be based on legality, fairness, integrity and respect for the fundamental rights of the person, in accordance with the applicable legislation and with the principles referred to in the Introduction.

The Recipients are required to be aware of the provisions of this Code of Ethics; the Company's Employees are also called upon to actively contribute to its scrupulous observance. To this end, the Company undertakes to ensure the maximum dissemination of this Code of Ethics, also through the use of adequate cognitive and training tools and awareness of its contents.

The Recipients undertake to scrupulously observe the provisions of this Code of Ethics at the time of acceptance of the office, or at the time of signing the employment contract or in any case from the beginning of their collaboration with the Company, and for the entire period in which they carry out activities at the same.

In particular, the Administration is required to be inspired by the principles of this Code of Ethics, as subsequently identified, in setting the objectives of the Company, in proposing investments and implementing projects, as well as in any decision or action relating to the management of the Company.

Likewise, the Managers and Heads of the corporate functions, in concretely implementing the Company's management activities, must be inspired by the same principles, both internally, thus strengthening cohesion and the spirit of mutual collaboration, and towards third parties with whom the Company comes into contact.

The principles contained in the Code of Ethics must also imprint relations between Company Employees of any level and/or category on any task, or relations between these and Third Parties unrelated to the same. Collaborators who are not bound by any relationship of subordination with the Company (such as, by way of example, Consultants, Suppliers, etc.), as well as Partners in business relationships and all those who have commercial relations with the same, are also required - in the context of the various relationships maintained - to adapt their conduct to the provisions of the Code of Ethics.

The Company may provide, in contractual relations with suppliers and business partners, specific clauses aimed at recalling the obligation to comply with the principles of this Code, reserving the right to adopt the measures deemed appropriate in the event of serious or repeated violations.

Third parties are also required to ensure the compliance of the production processes and products supplied with the applicable regulations, as well as to make available, upon request, information and documentation suitable for allowing checks on the quality, safety and conformity of supplies.

2. Obligations of employees and collaborators

The Company undertakes to ensure:

- a) the maximum dissemination of the Code of Ethics to the Recipients;
- b) the dissemination of tools for knowledge, training, clarification and awareness of the contents of the Code of Ethics;
- c) the performance of periodic checks on compliance by the Recipients with the provisions contained in the Code of Ethics;
- d) the updating of the Code of Ethics in relation to the development and change of management activities in the organisation, or to the violations found as a result of the aforementioned checks;
- e) the application of appropriate disciplinary measures in the event of violations of the principles and rules of conduct set out in the Code of Ethics.

The Company also promotes a corporate culture based on respect for legality, integrity, fundamental human rights and the principles of environmental and social responsibility, encouraging conduct consistent with these values in the performance of work and professional activities.

All Recipients have the duty to know the rules contained in the Code of Ethics and have the obligation to:

- a) diligently observe the provisions of the Code of Ethics, refraining from any conduct contrary to them;
- b) report to the Supervisory Body any conduct that, in the context of the Company's activities, is even potentially in violation of the provisions contained in the Code of Ethics, without prejudice to the methods and protections provided for by the company procedures on reporting and whistleblowing;

- c) promptly report any non-conformities detected in the products, production processes or documentation received from suppliers or partners, which may affect the quality, safety or regulatory compliance of the supplies;
- d) collaborate with the Supervisory Body in ascertaining possible and/or alleged violations of this Code of Ethics.

The Recipients are also required to carry out their activities in compliance with the principles of fairness, good faith, professional diligence and responsibility, avoiding conduct that may be detrimental to the dignity of persons, fundamental rights, health and safety at work or the environment.

With regard to Third Parties with whom the Company has relationships, in any way and form, the Recipients are obliged to:

- a) adequately inform them about the provisions of this Code of Ethics, as far as they are relevant in relation to the activities carried out;
- b) require compliance with the provisions of the Code of Ethics in the performance of activities for which such persons are in relationship with the Company, within the limits of their respective roles and contractual obligations undertaken;
- c) report to the Supervisory Body any conduct that, in the context of the relationship between Third Parties and the Company, is even potentially in violation of the provisions contained in the Code of Ethics and adopt the initiatives envisaged in the event of failure by Third Parties to comply with the provisions of the Code of Ethics.

In particular, the Company's Employees carry out the functions of their competence according to the principles of honesty, fairness, commitment and professional rigour, as well as operate, in the performance of the activities entrusted to them, in accordance with the provisions of the law in force.

Every action, operation, negotiation and, more generally, any activity carried out by the Company's Employees, must comply with the rules of managerial correctness, transparency, completeness and truthfulness of information, as well as with company procedures. The criteria of collaboration, loyalty and mutual respect must shape the relationships between Employees at any level, and

between them and Third Parties with whom they come into contact due to the work activities carried out.

The Company also undertakes to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to the violations that may occur, and in any case in compliance with the provisions in force on the regulation of employment relationships.

3. Ethical principles

In order to achieve its objectives, the Company complies with the principles that must inspire the Company's activities and guide the conduct of the Recipients, which are better specified below.

A. Compliance with the law and compliance with the rules of conduct

The conduct of the Recipients, in the activities carried out in the interest of the Company, is inspired by honesty and legitimacy, in accordance with the regulations in force.

B. Equality and impartiality

In the management of the various corporate activities and in all related decisions (including, but not limited to, the management of Personnel and the organization of work, the selection and management of Suppliers, relations with the community and the Institutions that represent it, etc.), the Recipients must operate impartially in the best interest of the Company, taking decisions with professional rigor and impartiality, according to objective and neutral evaluation criteria.

C. Integrity, honesty, transparency and reliability

In carrying out work or professional activities, the actions, operations, negotiations and, more generally, the conduct of the Recipients are inspired by the utmost transparency and reliability.

In the management of social activities, the Recipients are also required to provide transparent, truthful, complete and accurate information. In this regard, the Company, through the company

representatives in charge of this, collaborates with the Supervisory Bodies with regard to the performance of the tasks assigned to the latter.

The Recipients also guarantee the truthfulness, completeness and traceability of information relating to products, production processes and supplies, avoiding any significant alteration or omission.

D. Loyalty, fairness and good faith

The Recipients, in the context of the most diverse relationships established with the Company, must refrain from carrying out activities that are contrary to the interest of the same, aware that the pursuit of the Company's interest cannot justify, in any way, conduct contrary to the Principles of the Code of Ethics.

The Company, aware that a healthy and fair system of competition contributes to the better development of its corporate mission, scrupulously observes the rules in force on competition and refrains from engaging in and/or encouraging conduct that may constitute forms of unfair competition.

All the Company's activities must be conducted with the utmost commitment, diligence and professionalism in a spirit of mutual respect and collaboration.

The Recipients are called upon to carry out the activities for which they are responsible with a commitment appropriate to the Responsibilities entrusted to them, protecting the image and reputation of the Company.

It is forbidden to place on the market products that do not comply with the technical specifications, applicable regulations or quality standards defined by the Company.

E. Confidentiality

The Company recognizes confidentiality as a fundamental and necessary rule of all conduct.

The Company therefore ensures the confidentiality of the information in its possession and refrains from using confidential data, except in the case of express and informed authorization and, in any case, always in the strictest compliance with current legislation on data protection.

In the context of their various relations with the Company and its interlocutors, the Recipients must refrain from using confidential information that is not in the public domain, of which they have

become aware by reason of their office and/or profession, for personal purposes and, in any case, not connected with the exercise of the work or professional activity entrusted to them or carried out in the interest of the Company.

No Employee or Collaborator may derive any direct or indirect, personal or financial benefit from the use of confidential information, nor may he communicate such information to others or recommend or induce others to use it.

The communication of information to third parties must take place exclusively by authorized parties and, in any case, in accordance with company regulations.

Technical information, drawings, product specifications and any element of industrial know-how are protected and may not be used, reproduced or disclosed outside the contractual purposes.

F. Value of the Person and Human Resources

The Company protects and promotes the dignity of the human person and does not tolerate discrimination on the basis of age, sex, sexual orientation, race, language, nationality, political opinions, trade union membership or religious beliefs.

Requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behaviors that are harmful to the moral and personal beliefs and preferences of each person, are in no way tolerated.

Under no circumstances should there be any links with persons or associations pursuing terrorist purposes or subversion of public order.

Human resources represent an indispensable and precious value for the Company's very existence and future development.

In order to enhance the skills and competencies of its Employees, the Company adopts merit criteria and guarantees equal opportunities for all.

It also undertakes to ensure that authority is exercised fairly and correctly, avoiding any abuse. In particular, authority must never be transformed into an exercise of power detrimental to the dignity and autonomy of Employees and Collaborators in the broadest sense. The choices of work organization must safeguard the value of Employees and Collaborators.

The Company guarantees the physical and moral integrity of Employees and Collaborators, ensuring working conditions that respect individual dignity and safe and healthy working environments.

Requests, pressures or threats aimed at inducing anyone to act in violation of the law, the Code of Ethics or to adopt behaviors contrary to their moral and personal convictions are in no way tolerated.

It is forbidden to maintain relations or connections with persons or associations that pursue terrorist purposes or subversion of public order.

The Company also requires suppliers and partners to comply with occupational health and safety regulations, undertaking to evaluate these aspects in the context of contractual relations.

G. Environmental protection

The Company promotes corporate policies that reconcile the needs of economic development and value creation, typical of the business activities attributable to it, with the needs of respect and protection of the environment.

The Company is therefore committed to operating in compliance with current regulations, applying the best available technologies, to promote and plan the development of its activities aimed at enhancing natural resources, preserving the environment and promoting initiatives for widespread environmental protection.

The Company also promotes a responsible use of natural resources, the continuous improvement of its environmental performance and energy efficiency, committing itself to reducing, as far as technically and economically sustainable, the environmental impacts associated with its activities, also with a view to mitigating climate change.

In particular, the Company pays particular attention to energy efficiency aspects and promotes actions aimed at differentiation in the collection, recycling and proper disposal of waste.

The Company also operates taking into account the needs of the communities in which it carries out its activities and contributes to their economic, social and civil development.

The Company requires suppliers to comply with environmental regulations applicable to the products and materials used, including reporting obligations relating to the presence of hazardous or restricted substances.

H. respect for and promotion of fundamental human rights and working conditions

The Company recognises and promotes respect for fundamental human rights in the conduct of its business activities and in its business relations, in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Fundamental Conventions of the International Labour Organization (ILO) and the OECD Guidelines for Multinational Enterprises.

The protection of human rights is a transversal principle that guides business decisions, internal relations and relations with customers, suppliers and business partners.

1. Prohibition of forced and child labour

The Company:

- prohibits all forms of forced, compulsory or threatened labour, as well as all forms of trafficking in human beings;
- prohibits child labour in compliance with current legislation and applicable international standards;
- it does not retain identity documents or require deposits or guarantees as a condition for the establishment of the employment relationship.

2. Freedom of association and collective bargaining

The Company recognises and respects the freedom of trade union association and the right to collective bargaining, within the limits and in the manner provided for by applicable law.

3. Non-discrimination, dignity and inclusion

The Company:

- does not tolerate any form of discrimination based on age, sex, sexual orientation, gender identity, ethnic or national origin, language, religion, political or trade union opinions, personal or social conditions;
- prohibits harassment, intimidation, degrading treatment or any conduct detrimental to a person's dignity;

- promotes an inclusive corporate culture, aimed at valuing diversity and preventing any form of exclusion or unequal treatment.

4. Working conditions and wage protection

The Company guarantees:

- compliance with current legislation on working hours, rest and holidays;
- contractual conditions in accordance with the applicable collective agreements;
- remuneration in accordance with current legislation and the relevant collective agreements.

The Company is committed to ensuring fair working conditions that respect individual dignity.

5. Health and safety

The Company promotes safe and healthy working environments and adopts organisational and technical measures aimed at preventing accidents and occupational diseases, in accordance with current legislation.

6. Human rights risk prevention and management

The Company is committed to identifying, preventing and mitigating, in a manner proportionate to the nature and size of its activities, the risks of adverse impacts on human rights, including in the context of business relations.

This commitment translates into the adoption of criteria for the evaluation and selection of counterparties based on legality, integrity and compliance with the principles of this Code.

7. Reports and prohibition of retaliation

No recipient may be subject to sanctions, demotion, dismissal or other discriminatory or retaliatory measures for having made a report in good faith relating to violations of human rights, the rules of this Code or current legislation, in compliance with the *Whistleblowing procedure*.

8. Extension to supply chain relationships

The Company promotes compliance with the above principles also towards suppliers and business partners, within the limits of their respective responsibilities and contractual obligations.

9. Critical management and corrective measures

Should situations arise that may cause or have had a negative impact on the fundamental rights of individuals in the context of corporate activities, the Company undertakes to:

- promptly evaluate the facts reported or detected;
- to adopt, where necessary, corrective measures proportionate to the nature and seriousness of the situation;
- activate, within the limits of its competences and responsibilities, actions aimed at preventing the recurrence of similar circumstances.

The management of critical issues takes place in compliance with current legislation, company procedures and the competences of the corporate bodies and the Supervisory Body.

It is understood that the Company does not assume responsibility for autonomous conduct carried out by third parties outside its sphere of control, without prejudice to the right to adopt the contractual measures deemed appropriate towards the counterparties involved.

4. Rules of conduct

The conduct to be adopted in the performance of the various company activities is illustrated below, in order to comply with the contents of the Ethical Principles.

A. Corporate Governance *Rules*

(i) Correctness and transparency of Company Information

Each action, operation or transaction must be correctly recorded in the company's accounting system according to the criteria indicated by law and the applicable accounting principles, and must also be duly authorized, verifiable, legitimate, consistent and congruous.

It is forbidden to engage in conduct aimed at altering the correctness and truthfulness of accounting, corporate or tax data, or to obstruct the exercise of control functions by the corporate bodies, the Board of Statutory Auditors, the Statutory Auditor or the Supervisory Body.

In order for the accounting to meet the requirements of truthfulness, completeness and transparency of the data recorded, adequate and complete supporting documentation of the activity carried out must be kept in the records for each operation, so as to allow:

- a) accurate accounting records;
- b) the immediate identification of the characteristics and motivations underlying the transaction itself;
- c) the easy formal and chronological reconstruction of the transaction;
- d) the verification of the decision-making, authorisation and implementation process, as well as the identification of the various levels of Responsibility.

The Recipients are required to promptly report any irregularities, anomalies or violations found in administrative, accounting or tax management, according to the company procedures in force.

Each employee and collaborator works, within the scope of his or her competence, to ensure that any fact relating to business management is correctly and promptly recorded in the accounts.

Each accounting entry must accurately reflect the results of the supporting documentation. Therefore, it will be the responsibility of each employee and collaborator in charge of this to ensure that the supporting documentation is easily available and ordered according to logical criteria.

The Company promotes and disseminates, at all company levels, the culture of control, raising awareness among its Employees of the importance of the internal control system and compliance, in the performance of work activities, with current regulations and company procedures, in order to:

- a) ascertain the adequacy of the various business processes in terms of efficiency, effectiveness and cost-effectiveness;
- b) to guarantee the reliability and correctness of accounting records and the protection of company assets;
- c) ensure compliance of accounting and tax obligations with current legislation.

Internal control systems include the set of control activities that the individual corporate functions carry out on their processes, in order to protect company assets, effectively manage corporate activities and clearly provide information on the Company's assets, economic and financial situation, as well as all those activities aimed at identifying and containing corporate risks.

Employees and Collaborators are required, within the scope of their competence, to:

- a) actively collaborate in the correct and effective functioning of the internal control system;
- b) responsibly guard the company's assets, whether tangible or intangible, instrumental to the activity carried out and not to misuse them.

The corporate functions in charge and the Supervisory Body are guaranteed free access to data, documentation and any information useful for carrying out control activities.

(ii) Anti-Money Laundering

The Recipients, in the context of the various relationships established with the Company, must not, in any way and under any circumstances, be involved in events related to the laundering of money deriving from illegal or criminal activities.

Before establishing relationships or entering into contracts with Suppliers and other Partners in business relationships, the Company and its Employees and/or Collaborators must ensure the moral integrity, reputation and good name of the other party.

To this end, the Company promotes the adoption of counterparty valuation criteria based on transparency, traceability and economic consistency of the transaction, within the limits of reasonably available information.

The Company is committed to complying with all national and international anti-money laundering regulations and provisions.

(iii) External communications

Any external communication of documents and information concerning the Company or other parties with whom it relates must take place in compliance with the laws, regulations and professional conduct practices in force. It is, in any case, forbidden:

- a) the disclosure of any "price sensitive" information acquired in the performance of the company's activities;
- b) the dissemination of false or misleading news concerning the Company or other subjects with whom it relates in the performance of its activities;

c) any form of pressure aimed at acquiring favourable attitudes on the part of the public communication/information bodies.

To ensure completeness and consistency of information, the Company's relations with the mass media are reserved exclusively for the functions in charge.

Any communication concerning environmental, social or otherwise sustainability-related issues must be based on criteria of truthfulness, completeness and non-deception, avoiding misleading statements or statements likely to constitute "greenwashing" practices.

(iv) Gifts, Giveaways & Benefits

No form of gift or favour is permitted that could in any way be interpreted as exceeding normal commercial or courtesy practices, or that is in any case aimed at acquiring preferential treatment in the conduct of any of the activities in any way related to the Company. In any case, any form of promise, offer, request or acceptance of money or other benefits aimed at unduly influencing decisions or behavior of public or private entities is prohibited.

This rule concerns both gifts promised or offered and those received, a gift being understood as any type of benefit, compensation, personal utility or favor.

In any case, the gifts offered by the Company must be:

- a. authorised by the Head of the department involved, who will notify the General Management;
- b. adequately documented in order to allow the appropriate or necessary verifications;
- c. of modest value.

It is absolutely forbidden for the Company's Employees and Non-Subordinate Collaborators to offer gifts or other benefits to all those Subjects, from whom they may acquire preferential treatment in the conduct of any activity related to the same.

Employees and Non-Subordinate Collaborators may not request, for themselves or for others, or accept gifts or other benefits, except those of modest value or in accordance with normal commercial or courtesy practices, from anyone who has benefited, or may benefit, from the Company's activities. Anyone who, in the performance of their duties, receives (including on the

occasion of holidays) gifts or other benefits of more than modest value, and outside the cases permitted by applicable law, must promptly inform the General Management and the Supervisory Body in accordance with the procedures in place. The Supervisory Body will assess the appropriateness of the gift, including whether it should be returned, and will inform the sender of the Company's policy on the matter.

Gifts offered or received by Public Officials and/or Persons in Charge of Public Service are governed by specific provisions that are reported below in the paragraph "Relations with Third Parties".

In any case, the attribution of illicit advantages to public or private Customers or Suppliers is categorically prohibited.

The Recipients are required to avoid situations of conflict of interest, even if only potential, that may compromise the impartiality of the decisions taken in the interest of the Company, promptly informing their superiors or the competent functions in the event of significant situations.

In any case, any form of promise, offer, request or acceptance of money or other benefits aimed at unduly influencing decisions of public or private entities is prohibited.

B. Internal Reports

The Company recognises the centrality of human resources, in the belief that the most important factor in the success of any company is represented by the professional contribution of the people who work there, in an environment of loyalty and mutual trust.

The Company recognises respect for the work, professional contribution and commitment of each individual, respect for different opinions, regardless of seniority and experience, and the strength of ideas as essential principles of its corporate philosophy.

In this regard, the Company ensures equal opportunities at any level of the organization, according to merit criteria and without any discrimination.

The Company promotes an inclusive work environment, respectful of the dignity and fundamental rights of the person, based on the enhancement of skills, collaboration and individual responsibility. Employees and Collaborators are, on the other hand, required to commit and act loyally by ensuring the services due and the commitments undertaken towards the Company.

Also aware that professionalism is a value that is acquired through practice and experience and specific training, the Company recognizes the decisive contribution that this process receives from professionals with greater seniority and promotes the transfer of their knowledge and professional attitude to younger personnel.

The Company pursues the enhancement of professionalism, promotes the aspirations of individuals, the expectations of learning, professional and personal growth of each one.

(i) Discrimination and harassment

The Company, in protecting and promoting the dignity of the human person, does not tolerate discriminatory conduct or any form of harassment, including personal or sexual harassment.

The Company is therefore committed to providing a work environment that excludes any form of discrimination and harassment related to race, sex, religious beliefs, nationality, age, sexual orientation, disability, language, political and trade union opinions or other personal characteristics not related to work.

Harassment, intimidation, degradation or detrimental to the dignity of the person is not tolerated, nor any form of retaliation against those who report in good faith conduct that does not comply with this Code or with the regulations in force.

(ii) Prohibited behaviors at work

Any illegal conduct or any form of abuse, threat or aggression against people or company property is strictly prohibited in the workplace.

Personnel are required to report on conduct of this nature and, in any case, on any alleged violation of rules, directives or procedures in accordance with the procedures provided for by the company procedures in force, including those relating to reporting and whistleblowing, which guarantee the confidentiality of the whistleblower and protection from any retaliation.

(iii) Safety and health at work

The Company guarantees working conditions that respect individual dignity and safe and healthy working environments, also through the dissemination of a culture of safety and risk awareness, promoting responsible behaviour by all.

With this in mind, each Employee and Collaborator is required to personally contribute to maintaining the quality of the work environment in which they operate, scrupulously adhering to the safety system set up and all the company procedures that form part of it.

The Company undertakes to:

- a) to implement safe activities in order to protect the health of its employees and the community surrounding its premises, aligning its operating strategies with compliance with the company policy on safety, health and the environment;
- b) to guarantee training and information to all those who work at the company headquarters, on the risks related to safety to which they are exposed from time to time, ensuring them the means and personal protective equipment required by current legislation in relation to the type of activity carried out;
- c) continuously monitor the efficiency of the system to protect against safety-related risks, in pursuit of objectives of continuous improvement in this delicate sector.

The Company also encourages the reporting of potentially dangerous or non-compliant situations, promoting a culture of prevention and continuous improvement in occupational health and safety.

C. Relations with Third Parties

The Company is particularly careful to develop a relationship of trust with all its possible interlocutors, i.e. individuals, groups or institutions whose contribution is necessary to pursue its corporate mission, as well as with Collaborators, Customers, Suppliers, Business Partners, Public Institutions, the market, political, trade union and social organizations and any other Subject, whose interests may be, directly or indirectly, affected by the Company's activities.

In carrying out its activities, the Company complies with the principles of loyalty and fairness, requiring all those who operate on its behalf to behave honestly, transparently and in accordance

with the law in any relationship they have, not tolerating corrupt and/or collusive conduct, nor undue favoritism.

The Company also requires that relations with Third Parties be based on respect for the fundamental rights of the person, the protection of health and safety and the protection of the environment, in accordance with the principles referred to in this Code.

The Company, aware of the importance of the services rendered, ensures the transparency of its actions and behaviors.

(i) Relations with private and public customers

In line with the fundamental values of which it is the bearer and aware of the fact that each Client has different needs and expectations and that each represents, in any case, an opportunity for growth, the Company bases its relations with all Clients, whether private or public, on the principles of integrity, honesty, fairness, respect and mutual trust, as well as professionalism, independence and fairness.

Commercial relationships must be managed in a transparent, traceable manner and in compliance with current legislation, avoiding any behaviour that could alter free competition or lead to undue advantages.

Relations with Public Administrations, public bodies, including economic ones, bodies or public companies of a local, national or international nature (hereinafter referred to as the "Public Administration"), must be based on the strictest compliance with the legislative provisions in force, as well as conform to the principles of honesty, fairness and transparency and compliance with existing internal procedures.

It is forbidden for the Recipients to promise, offer, correspond or request, even through an intermediary, money, goods or other benefits in order to influence the impartiality of judgment or obtain an undue advantage in relations with the Public Administration or with private subjects.

It is also forbidden:

- make untrue statements or omit information due in order to obtain public disbursements, contributions, financing or other benefits;
- use public contributions, subsidies or funding for purposes other than those for which they were granted;
- to implement conduct that may hinder the exercise of control functions by the competent authorities.

The Company also provides that the Personnel Responsible for the negotiation and management of contractual relations with the Public Administration ascertain the truthfulness and correctness of the declarations made to the Public Administration, with particular reference to information relating to the possession of requirements, or costs and financial data.

Every relationship with the Public Administration must be documented and managed in compliance with the principles of separation of functions, traceability of decisions and consistency with the delegations and powers of attorney conferred.

(ii) Supplier Relations

Similarly, the Company manages relations with Suppliers with loyalty, fairness, professionalism, encouraging continuous collaborations and solid and lasting relationships of trust.

The selection of Suppliers and the determination of the conditions for the purchase of goods and services are made on the basis of objective and impartial evaluations, based on quality, price and the guarantees provided.

The Company also takes into account, within the limits of the information reasonably available and the relevance of the relationship, profiles relating to reliability, integrity, compliance with current legislation and the principles of protection of fundamental rights, health and safety and the environment.

The assumption of commitments and the management of relations with current and potential Suppliers must be carried out in compliance with the rule contained in this Code of Ethics on the prevention of conflicts of interest.

It is forbidden for the Recipients to establish or maintain relationships with Suppliers in the presence of situations of conflict of interest that are not declared or not adequately managed.

In its relations with its Suppliers, the Company promotes conduct consistent with the principles of this Code, in particular with reference to:

- respect for human rights and decent working conditions;
- the prohibition of forced and child labour;
- the protection of health and safety in the workplace;
- compliance with environmental legislation.

To this end, the Company may require Suppliers to adhere to the principles of this Code or equivalent standards, as well as reserve the right to take the measures deemed appropriate in the event of serious or repeated violations.

Where applicable in relation to the products or components supplied, the Company pays attention to the risk of sourcing raw materials from areas affected by armed conflicts or serious human rights violations, adopting assessment criteria consistent with current legislation and industry best practices.

(iii) Relations with Public Administrations and Institutions

Relations with national, EU or international public administrations and institutions must be based on the strictest compliance with the legislative provisions in force, as well as conform to the principles of honesty, fairness and transparency.

Relations with national, EU or international public administrations and institutions, as well as with Public Officials or Public Service Officers, or Bodies, Representatives, Agents, Representatives, Members, Employees, Consultants, must not improperly influence the decisions of the Administrations or Institutions themselves, in particular of the Officials who deal or decide on their behalf.

It is forbidden for the Recipients to promise, offer, correspond or request, directly or indirectly, money, goods or other benefits, even through an intermediary, in order to influence the impartiality of judgment or obtain an undue advantage in relations with the Public Administration.

During a negotiation or business relationship, including a commercial one, with Public Administrations or Institutions, the Company refrains from the following conduct:

- offer or grant job opportunities and/or commercial advantages to Public Officials involved in the negotiation or relationship, or to their family members;
- offer gifts or other benefits, except in the case of acts of commercial courtesy of modest value;
- make false information or omit to communicate material facts, where required.

It is also forbidden:

- submit untruthful declarations or documentation in order to obtain public disbursements, contributions, funding or other benefits;
- use sums received from public bodies for purposes other than those for which they were disbursed;
- obstruct, with omissive or commissive conduct, the control activities carried out by the competent authorities.

It is also not permitted for the Company's Representatives and/or Employees to correspond, nor to offer, directly or through Third Parties, sums of money or other benefits of any kind and entity to Public Officials, whether they are Public Officials, Government Representatives, Public Employees, to compensate or repay them for an act of their office, or to obtain or delay the execution of an act contrary to the duties of their office.

Any relationship with the Public Administration must be managed in compliance with the principles of traceability, separation of functions and consistency with the delegations and powers of attorney conferred.

(iv) Relations with Independent Administrative Authorities and Organizations

The Company undertakes to scrupulously observe the rules dictated by the Independent Administrative Authorities (e.g., the Guarantor for the Protection of Personal Data) for compliance with the regulations in force in the sectors related to its activities.

The Recipients undertake to comply with any request that may come from the Independent Administrative Authorities in the exercise of their functions and to provide full cooperation during the preliminary procedures.

It is forbidden to obstruct, even indirectly, the supervisory or control activities of the competent authorities, as well as to provide incomplete, untrue or misleading information.

To ensure maximum transparency, the Company undertakes not to find itself with Officers/Employees of Independent Administrative Authorities or their family members in situations of conflict of interest. Any situations of conflict of interest, even if only potential, must be promptly communicated and managed according to the company procedures in force.

In relations with these Authorities, no form of gift is permitted that is, in any case, aimed at acquiring preferential treatment in the conduct of any of the activities that can be connected in any way to the Company. This rule concerns both gifts promised or offered and those received, a gift being understood as any type of benefit.

In any case, any form of undue pressure, promise or attribution of advantages aimed at influencing decisions or assessments of the competent authorities is prohibited.

The Company contributes to the economic well-being and growth of the community in which it operates. To this end, it conforms, in the performance of its activities, to respect local and national communities, encouraging dialogue with trade unions or other associations.

Relations with trade unions, trade associations and other representative organizations must be based on transparency, fairness and mutual respect.

The Company bases its relations with political parties or their Representatives or Candidates on the strictest compliance with current legislation and company directives.

It is forbidden to make contributions, direct or indirect, to political parties, movements, committees or candidates, except as expressly permitted by law and subject to the authorisation of the competent bodies of the Company.

The Company encourages and supports social, sporting, humanitarian and cultural initiatives, possibly also through the provision of contributions in favour of Foundations, Institutions, Organisations or Bodies dedicated to the performance of social and cultural activities and, more generally, oriented towards the improvement of living conditions and the dissemination of a culture

of peace and solidarity. The process of disbursement of these contributions must take place in compliance with the regulatory provisions in force and be correctly and adequately documented. Donations must be motivated, traceable, consistent with the institutional purposes of the Company and must not constitute a tool to obtain undue advantages or preferential treatment.

The Company does not promote or maintain any kind of relationship with Organizations, Associations or Movements that pursue, directly or indirectly, criminally illicit purposes or, in any case, prohibited by law.

The Company also refrains from any form of support, even indirect, to persons involved in activities contrary to the principles of legality, respect for human rights and protection of public order.

D. Confidential information and data protection

(i) General principles

The Company takes care of the application and constant updating of specific procedures aimed at protecting information. Each Recipient, with reference to any information learned by reason of his or her work function, is obliged to ensure the utmost confidentiality, also in order to safeguard the Company's technical, financial, legal, administrative, managerial and commercial know-how. Company information, regardless of the form in which it is represented, constitutes a strategic asset of the Company and must be treated with the utmost diligence and according to criteria of integrity, availability and confidentiality. In particular, each subject is required:

- to acquire and process only the information and data necessary for the purposes of the function to which they belong and in direct connection with the latter;
- to acquire and process the information and data exclusively within the limits established by the procedures adopted by the Company;
- to store data and information in such a way as to prevent them from becoming known to unauthorized Parties;
- to communicate the data and information in accordance with the established procedures or with the express authorisation of the hierarchical superiors and, in any case, in case of doubt or uncertainty, after having ascertained (by contacting the Superiors or objectively verifying in company practice) the disclosure of the data or information in the specific case;

- to ensure that there are no absolute or relative constraints on the disclosure of data and information regarding Third Parties connected to the Company by relationships of any nature and, if necessary, to request their consent.

It is forbidden to use confidential information for personal purposes or in any case not related to company activities, as well as to disclose or communicate it to unauthorized parties.

The Company undertakes to protect the confidentiality of all information of any nature or object that it comes into possession of in the course of its activities, avoiding any improper use or undue dissemination of such information.

(ii) Protection of data processing, *cybercrime* and copyright protection

The Company undertakes to protect personal data in full compliance with Legislative Decree No. 196/2003, Regulation (EU) 2016/679 (GDPR) and Law No. 48/2008 on cybercrime, ensuring that personal data collected and stored are processed within the scope of its activities so as to prevent any unlawful access, use or even improper handling of such information. Personal data are processed in accordance with the principles of lawfulness, fairness, transparency, data minimisation, purpose limitation, accuracy, integrity and confidentiality, and in compliance with the accountability principle.

In particular, the Company adopts specific standard procedures in order to:

- provide Data Subjects with adequate information on the purposes and related methods of data processing and storage;
- identify the cases in which the processing, communication and dissemination of data must be preceded *by the* acquisition of the consent of the Data Subject;
- adopt security measures aimed at avoiding the loss, destruction and unauthorized processing or loss of personal data held by the Company;
- define rules for the exercise of the rights granted to data subjects under applicable data protection legislation;
- to avoid abusive access to information systems of Third Parties. Such action could be driven by the desire to damage an IT or telematic system, the data or programs contained therein or to allow the Company to acquire information on Competitors, with an advantage deriving from a better ability to guide company decisions and directions;

- comply with the rules on intellectual property and patent protection with particular reference to *software* and intellectual works;
- prevent and combat conduct that may constitute computer crimes, damage to information systems or unlawful processing of data;
- promote a culture of IT security through appropriate organisational and technical measures and staff awareness-raising activities;

In any case, any investigation into the ideas, preferences, personal tastes and, in general, the private life of Employees and Collaborators is prohibited. The installation or use of software that is unlicensed or otherwise infringes intellectual property rights is prohibited.

5. Violations and sanctioning consequences

Compliance with this Code of Ethics must be considered an essential part of the contractual obligations of the Company's Employees according to the regulations applicable to them on the subject of employment relationships. Consequently, any violation of the provisions of the Code of Ethics may constitute a breach of the obligations of the employment relationship and/or a disciplinary offence in accordance with applicable legislation. The application of disciplinary sanctions takes place in compliance with the provisions of the law and the applicable collective bargaining agreement, as well as the principles of proportionality, gradualness and adversarial proceedings.

Compliance with the principles of this Code of Ethics is also part of the contractual obligations assumed by Collaborators, Consultants and other Parties in business relations with the same.

Consequently, any violation of the provisions contained therein may constitute a breach of the contractual obligations undertaken, with all legal consequences with regard to the termination of the contractual relationship and compensation for damages derived, in accordance with the provisions of the applicable legislation.

The Company may also suspend or interrupt relations with Third Parties who commit serious or repeated violations of the principles contained in this Code, in particular with regard to legality, anti-corruption, protection of human rights, health and safety and environmental protection.

It is understood that violations committed by Persons who hold positions of representation, administration, management or control within the Company will result in the assumption, by the competent corporate body, of the sanctioning measures deemed most appropriate in relation to the nature and seriousness of the violation committed and the qualification of the Person responsible for the violation, in accordance with applicable legislation.

Violations relevant for the purposes of Legislative Decree no. 231 of 8 June 2001 may result in the activation of the measures provided for by the Organisation, Management and Control Model adopted by the Company.

Compliance with the rules of this Code of Ethics is also an essential component in relations with other Third Parties, who, operating and having relations with the company, must scrupulously comply with them by virtue of specific contractual clauses which, therefore, must always be provided for in such contracts. In this case, failure to comply with the Code of Ethics will be or may be considered as a breach of contract with all legal consequences, including the termination of the contract and/or assignment by law, with the consequent right to claim compensation for damages by the Company.

The prohibition of acts of retaliation against those who have made reports in good faith according to the company procedures in force remains unaffected.

6. Approval of the Code of Ethics and related amendments

This Code of Ethics has been approved by the Company's Board of Directors. The Code of Ethics is an integral part of the Organisation, Management and Control Model adopted pursuant to Legislative Decree no. 231 of 8 June 2001. Any changes and/or updates to the same will be approved by the same corporate body and promptly communicated to the Recipients.

The Supervisory Body is informed of the updates to this Code and expresses its assessments where required, with particular reference to consistency with Model 231 and with regulatory and jurisprudential developments.

Changes may be necessary, by way of example, in the event of:

- national or international regulatory updates relevant to the Company's business;
- significant organisational or operational changes;
- results of verification and control activities;

- evolution of best practices in corporate social responsibility and sustainability.

The Company ensures the timely dissemination of the changes made and takes care of their adequate publicity through the company tools deemed most suitable.