



ISGEV

A better life

ORGANIZATION, MANAGEMENT AND CONTROL MODEL

(in implementation of Legislative Decree No. 231/2001 and subsequent
amendments and additions)

Code of Conduct

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1. INTRODUCTION

1.1. MISSION, VISION, AND GUIDING VALUES OF ISGEV S.P.A.

The mission of ISGEV S.p.A. is to provide customers with the best solutions in an economically sustainable way.

To achieve this objective, ISGEV S.p.A. ensures the involvement of a complex and functional network system that, despite operating within the framework of a single contractual relationship with the client, guarantees specialized expertise and skills for the development of competitive solutions.

At ISGEV S.p.A.:

- Our decisions aim to improve customers' lives. This is why we focus on the quality and safety of our products and services, working alongside clients to provide the most suitable solutions for their needs.
- Working conditions enable employees and external collaborators to perform their tasks with pleasure, conviction, and perseverance. The values we prioritize in this context include integrity, mutual respect, trust, transparency, professionalism, training, and a suitable work environment.
- We consider the socio-economic and environmental context fundamental, requiring the company to operate with integrity, commitment, and respect toward all stakeholders, the environment, and the local territory.
- Revenue growth and the strengthening of value-creation capabilities are pursued in compliance with the laws and regulations in force, as well as the values and principles outlined above.

1.2. PURPOSE OF THE CODE OF ETHICS

ISGEV S.p.A. (hereinafter referred to as "the Company") adopts this Code of Ethics as an integral part of its Organizational, Management, and Control Model under Article 6 of Legislative Decree 231/01 regarding corporate administrative liability (hereinafter referred to as "the Model").

The Code of Ethics serves the following functions:

- **Cognitive Function:** By outlining abstract and general principles as well as behavioral rules, the Code helps recognize unethical behavior and provides guidelines for the proper exercise of assigned functions and powers.

- **Preventive Function:** By codifying the ethical principles and basic behavioral rules that all Recipients (see below) must adhere to, the Code serves as an explicit declaration of the Company's firm commitment to legality, particularly in preventing unlawful activities.
- **Encouragement Function:** By enforcing the observance of its principles and rules, the Code fosters ethical awareness and strengthens the Company's reputation. The Company's credibility and that of its employees depend on compliance with this Code.

1.3. RECIPIENTS

The rules of the Code of Ethics apply—without exception—to Corporate Bodies, employees, external professionals, business partners, suppliers, and all those who engage with the Company, regardless of where they operate.

1.4. RESPONSIBILITIES OF ISGEV S.P.A.

The Company commits to:

- Ensuring maximum dissemination of the Code among employees and third parties engaging with the Company;
- Keeping the Code up to date in response to changes in business needs and applicable regulations;
- Providing the necessary tools to enhance understanding and implementation of the Code's provisions;
- Conducting verifications regarding any reported violations and, in confirmed cases, implementing appropriate disciplinary measures.

The primary responsibility for embodying the values and principles outlined in the Code rests with Corporate Bodies and Company ownership. Written codes and stated behaviors alone do not ensure compliance; adherence to conduct rules is ensured by management's actions and leadership by example.

Corporate Bodies, particularly the Board of Directors, must implement the Code's principles when setting business goals, making investment decisions, and adopting strategies that affect the Company's financial, operational, and technological assets, shareholder returns, and employee well-being.

The Company strictly adheres to applicable laws and regulations in all countries where it operates. Violations of these principles are not tolerated, and the Company actively combats corruption by implementing organizational safeguards to prevent and monitor compliance with the Code.

Each organizational function head must:

- Lead by example in adherence to the Code;
- Guide employees and external workers to comply with the Code;
- Ensure that employees understand that compliance with the Code is essential to job performance;
- Carefully select personnel and external collaborators to ensure they are committed to ethical conduct;
- Promptly report to superiors or the Supervisory Body any information regarding potential Code violations;
- Implement corrective measures when necessary;
- Prevent any form of retaliation.

1.5. APPLICATION OF THE CODE TO THIRD PARTIES

With regard to third parties, all Company personnel, within the scope of their responsibilities, must:

- Provide adequate information regarding the commitments and obligations imposed by the Code;
- Ensure compliance with the Code's provisions relevant to their activities;
- Take appropriate internal and, if necessary, external measures in response to third-party violations of the Code.

1.6. CONTRACTUAL VALUE OF THE CODE OF ETHICS FOR EMPLOYEES

The rules of the Code of Ethics form an integral part of employees' contractual obligations under Articles 2104 (Diligence of the Employee) and 2105 (Duty of Loyalty) of the Italian Civil Code¹.

Non-compliance with the Code's principles is subject to disciplinary evaluation by the Company in accordance with applicable labor regulations, with sanctions proportional to the severity of the violation.

Art. 2104 c.c. Employee's Duty of Diligence

"The employee shall perform their duties with the diligence required by the nature of the service, the interests of the company, and the superior interest of national production.

The employee shall also comply with the provisions for the execution and discipline of work issued by the employer and their hierarchical superiors.

"

Art. 2105 c.c. Employee's Duty of Fidelity

"The employee shall not conduct business, on their own behalf or on behalf of third parties, in competition with the employer, nor shall they disclose information pertaining to the organization and methods of production of the company, or use such information in a way that may cause harm to the company."

2. GENERAL PRINCIPLES

2.1. COMPLIANCE WITH LAWS AND REGULATIONS

The Company's fundamental principle is to comply with the laws and regulations in force in all countries in which it operates.

This commitment is binding on consultants, suppliers, customers and anyone who has a relationship with the Company. The Company will not initiate or continue any relationship with parties who do not intend to comply with this principle.

Under no circumstances does the pursuit of the Company's interest justify or make acceptable conduct that is contrary to the provisions of the law.

The Company ensures that appropriate information and continuous awareness-raising activities will be carried out regarding the issues related to this Code, the Model and their application.

2.2. HONESTY AND INTEGRITY IN RELATIONSHIPS

The relationships established by the recipients of the Code in reference to their professional relationship with the Company, whether internal or external to it, must be based on respect for the law and the individual personality of each one, in application of the Principles of the Code of Ethics and the provisions of the Model.

The conduct of relations, of any order and degree, must take place in accordance with transparency, fairness, honesty and loyalty. Relations, both internal and external, avoid any discrimination based on age, gender, race, nationality, personal and social conditions, religious or political beliefs.

The Company does not tolerate violations of this principle and discourages corruption in any way.

2.3. RELATIONS WITH THE PUBLIC ADMINISTRATION AND INSTITUTIONS

In relation to any relationship with the Public Administration and institutions, both national and foreign, it is forbidden to offer and/or accept any object, service, benefit or sums of value or other utility for the execution of acts contrary to or in accordance with one's office.

In countries where it is customary to offer gifts to customers or other parties as a sign of courtesy, such gifts must be of an appropriate nature and value, must not conflict with the provisions of the law in force at that time and must not - under any circumstances - be interpreted as consideration in the request for favors and/or concessions. In any case, this

type of expense must always be authorized by your manager and documented appropriately.

2.4. MANAGEMENT AND CONDUCT OF OPERATIONS

Every operation and economic transaction of the Company must be legitimate, authorized, correctly recorded, consistent, appropriate, verifiable. The Company promotes and encourages the adoption of all those instruments necessary to ensure that the actions and operations carried out in the interest of the Company have adequate and coherent registration, in order to allow verification of the process of decision, authorization and execution. The management and conduct of operations must take place in compliance with the criteria of correctness, economy, transparency, efficiency and effectiveness.

2.5. CONFLICT OF INTEREST

All personnel in the exercise of their functions must not make decisions or carry out activities in conflict with the interests of the Company or incompatible with their official duties. Even the Directors must strictly adhere to this principle. Situations in conflict with this rule must be communicated immediately to their Managers.

In particular, the members of the corporate bodies, the company management, the employees and collaborators of the Company must avoid conflicts of interest between any personal and family economic activities and the tasks they perform within the structure to which they belong.

2.6. IMPARTIALITY

In relations with its stakeholders (for example, tenders, litigation proceedings, exams and competitions, etc.) the Company avoids any discrimination based on age, gender, sexual orientation, health, race or nationality, political opinions and religious beliefs, does not take into account recommendations or suggestions from external or internal sources and ensures impartiality and fairness in compliance with legal or contractual rules and the principles enshrined in this Code of Ethics.

2.7. CONFIDENTIALITY AND PROTECTION OF INFORMATION

The Company protects the confidentiality of information and data in its possession, operating in compliance with the laws and regulations in force on the subject.

All personnel of any level and external collaborators are required to comply with this principle even after the termination of the employment relationship.

The obligation of confidentiality on the confidential information acquired is also imposed on the subjects with whom the Company has contractual or other relationships, through specific contractual clauses or through the signing of confidentiality agreements.

The Company adopts the appropriate measures to ensure that the management within it and communications outside of information, for any reason, takes place in compliance with the laws and regulations in force and in accordance with the principles of transparency and fairness.

The information intended for the public must be clear, complete, truthful and not misleading, such as to allow recipients to make informed decisions.

The Company identifies and indicates the channels, forms and managers for communication actions to and from third parties.

2.8. PROTECTION OF COMPANY ASSETS

The Company promotes the protection and use of company assets, equipment and resources in a correct, economical, efficient and effective manner, in order to pursue its corporate purpose.

2.9. CORRECT MAINTENANCE AND RELIABILITY OF ACCOUNTING SITUATIONS

The Company complies with the rules and principles for the preparation of annual and interim accounting statements and the rules and principles that govern the keeping of accounts. The information, company data and accounting interactions of management events must guarantee transparency, accuracy and completeness and give a faithful representation of the management activity and the financial and equity situation.

2.10. BEHAVIOURS IN THE WORKPLACE

The Company's staff must conform their activities to the company provisions and procedures, in compliance with the rules established by law and the employment contract.

2.11. INDIVIDUAL RESPONSIBILITY

Everyone is responsible for the actions taken in carrying out their work activity. In addition, for those who perform managerial functions, there is also the responsibility to supervise the work carried out by the personnel under their direction and control.

2.12. HYGIENE, SAFETY AND PROTECTION OF THE WORKING ENVIRONMENT

The Company has as primary values the policies for safety and protection of the working environment. The long-term objective is to tend towards the elimination, as far as reasonably possible, of the number of accidents at work and their impact on the working environment, leveraging technological investments, new active policies for the human factor and the training and information of workers.

To this end, the Company is committed to increasingly stimulating employees to substantial compliance with the vast legislative framework launched with laws 626/94, Legislative Decree 272/99, culminating in the approval of the Consolidated Law on Safety (Legislative Decree 81/08). The Company is also committed to ensuring that the regulations for safety protection prevail over its short-term economic and production needs. To achieve this goal, it has allocated an appropriate share of economic resources to safety and is committed to verifying, at each modification of production programs and/or organizational methods, that the new work methods are actually carried out safely.

2.13. PRIVACY

The collaborator's privacy is protected by adopting standards that specify the information that the company requests from the collaborator and the related methods of processing and storage.

Any investigation into the ideas, preferences, personal tastes and, in general, the private life of the collaborator is precluded. These standards also provide for the prohibition, without prejudice to the cases provided for by law, to communicate personal data without the prior consent of the interested party.

2.14. RESPONSIBILITY IN BUSINESS

The Company ensures that the conduct of business is based on the principles of integrity and transparency.

In particular, all operations, negotiations, and in general the behaviors implemented in business practice must be based on the utmost correctness, with the exclusion of any phenomenon of corruption or favoritism, completeness and transparency of information and legitimacy, not only on a formal basis, in accordance with current regulations and internal procedures.

2.15. DEVELOPMENT AND PROTECTION OF PROFESSIONALISM

The Company is committed to developing the skills and competencies of its personnel, pursuing a policy based on equal opportunities and merits, considering professionalism a guarantee for the entire community and a determining condition for achieving its objectives. Therefore, research, selection, hiring and career development respond only to objective assessments of work quality, without any discrimination.

2.16. THE STRATEGIC VALUE OF HUMAN RESOURCES

Human Resources are considered a primary value for the achievement of the Company's objectives, by virtue of the professional contribution made within the scope of a relationship based on loyalty, fairness, mutual trust and full respect for Individual Personality.

The Company protects and promotes the value of Human Resources, favoring their professional growth, committing itself to avoiding discrimination of any kind and guaranteeing equal opportunities, as well as offering working conditions that respect individual dignity and safe and healthy work environments, in compliance with current regulations and workers' rights.

The relationships between the different hierarchical levels (related to the different levels of responsibility existing within the Company) must be based on the principles mentioned above.

The Company does not allow the conduct of extra-contractual employment relationships and is committed, with regard to child labor, not to hire workers under the age of 15 pursuant to paragraph 1 of art. 2 of the Minimum Age Convention, or, for developing countries referred to in paragraph 4 of the aforementioned article, not to hire workers under the age of 14.

In personnel management, the Company ensures equal opportunities for all, guaranteeing fair treatment based on merit criteria, without any discrimination.

The Company is also committed to protecting the moral integrity of personnel, preventing them from suffering illicit conditioning or undue inconvenience. For this reason, it safeguards personnel from acts of psychological violence and combats any discriminatory or offensive attitude or behavior towards the person, their beliefs and their preferences.

Sexual harassment or intimidating and hostile attitudes in internal or external work relationships are not allowed.

2.17. ENVIRONMENTAL PROTECTION

The environment is a primary asset to be protected and as such must be managed according to sustainable logic. Consistent with this assumption, the Company plans its activities seeking the best possible balance between its economic initiatives, aimed at ensuring the



satisfaction of corporate objectives, and environmental needs, without compromising the ability of future generations to achieve their own.

ISGEV S.P.A. promotes virtuous conduct aimed at improving the environmental impact of company processes and products, both locally and globally.

3. CRITERIA OF CONDUCT

In implementing the General Principles set forth above, the Company also promotes the following Criteria of Conduct, on the understanding that its activities must always be based on respect for the law and the principle of good faith.

3.1. CRITERIA OF CONDUCT IN RELATIONS WITH SUPPLIERS AND CUSTOMERS

The Company seeks maximum competitive advantage in purchasing processes, but always with a view to mutual loyalty, transparency and collaboration. The Company grants equal opportunities to every supplier.

In particular, in the selection of Suppliers and in the awarding of professional assignments, objective and transparent selection mechanisms must be respected, inspired by principles of competence, cost-effectiveness, transparency and fairness.

In any case, if the supplier, in carrying out its activities for the Company, adopts conduct that is not in line with the general principles of the Code, the Company is entitled to take appropriate measures (within the remedies provided by applicable law), up to the exclusion of any further opportunities for collaboration.

The Company bases its relationships with suppliers on their integrity and independence; the stipulation of a contract with a supplier must always be inspired by extreme clarity, avoiding, where possible, forms of dependence.

All activities of contractual relationship with Suppliers must be documented and traceable.

All fees and/or sums paid for any reason to Suppliers and assignees of professional assignments are adequately documented and in any case proportionate to the activity, service or supply performed, also taking into account market conditions.

The Company also provides to reserve contractually the right to adopt any appropriate measure (including termination of the contract) in the event that the Supplier, in carrying out activities in the name and/or on behalf of the Company, violates the laws and the Code.

Crimes related to falsity in instruments or signs of recognition and crimes against industry and commerce

Without prejudice to the obligation to refrain from any other unlawful conduct, the Company prohibits in particular the following:

- the sale of goods in place of others or products different in origin, provenance, quality or quantity from those declared or agreed;
- the manufacture or industrial use of objects or other goods made by usurping an industrial property right or in violation thereof (being aware of the existence of the industrial property right) and, in particular, the use of information or data, owned by the customer or third parties, protected by an industrial property right, outside of specific authorization from the customer or the third party themselves;
- the placing on sale or circulation of industrial products, with national or foreign names,

- trademarks or distinctive signs, suitable to mislead the buyer about the origin, provenance or quality of the work or product;
- the production or introduction into the territory of the State for the purpose of trading (in violation of the rights belonging to the legitimate owner), of works of intellect or industrial products bearing counterfeit national or foreign trademarks or distinctive signs;
 - the production or introduction into the territory of the State for the purpose of trading of works of intellect or industrial products by usurping designs or models, national or foreign, or counterfeiting, altering the same designs or models.

3.2. CRITERIA OF CONDUCT IN PERSONNEL SELECTION AND EMPLOYMENT RELATIONSHIP

The choice of employees and non-dependent collaborators (agents, resellers, consultants, etc.) is transparent, motivated, authorized and based on objective and verifiable general requirements (competence, professionalism, experience, honorability).

The adequacy of compensation to employees and third parties in relation to the services rendered is in line with market conditions and compensation is paid with objective evidence of the service rendered.

Personnel selection takes place in compliance with the principles of equal opportunities and without discrimination with reference to the private sphere or the opinions of candidates. Personnel are hired with a regular employment contract: no form of irregular work is tolerated. Upon establishment of the employment relationship, each employee/collaborator receives accurate information regarding:

- characteristics of the functions and tasks to be performed;
- regulatory and remuneration elements, as regulated by the CCNL;
- rules and procedures to be adopted in order to avoid possible health risks associated with work activity.

This information is presented to the employee/collaborator in such a way that acceptance of the assignment is based on an effective understanding.

Personnel management policies are made available to all employees/collaborators through company communication tools (organizational documents and communications from managers).

Managers fully utilize and enhance all the professional skills present in the structure by activating the levers available to promote the development and growth of their collaborators.

Every manager is required to enhance the working time of employees/collaborators by requesting work performance consistent with the exercise of their duties and with work organization plans.

It constitutes abuse of the position of authority to request, as an act owed to the hierarchical superior, services, personal favors, or any conduct that constitutes a violation of this ethical code.

The involvement of employees/collaborators in the performance of work is ensured, also providing for moments of participation in discussions and decisions functional to the achievement of company objectives. The employee/collaborator must participate in these moments with a spirit of collaboration and independence of judgment.

The employee/collaborator must act loyally in order to comply with the obligations signed in the employment contract and the provisions of the Ethical Code, ensuring the required services; the employee/collaborator must know and implement company policies on information security to ensure integrity, confidentiality and availability. They are required to process their documents using clear, objective and exhaustive language, allowing any checks by colleagues, managers or external parties authorized to request them.

3.3. CRITERIA OF CONDUCT FOR THE PROTECTION OF THE WORKING ENV. AND PRIVACY

The Company strives to create a work environment that guarantees conditions respectful of the dignity of all those who interact with the Company, and in which human characteristics, beliefs or preferences of individuals cannot give rise to discrimination, conditioning or injurious acts against the person.

The Company is committed to protecting privacy regarding data relating to the private sphere and opinions of workers.

The Company requires that in internal and external work relations no one be placed in a state of subjection by means of violence, threat, deception, abuse of authority, exploitation of a situation of physical or mental inferiority, or of a situation of need. The Company disapproves of any form of harassment, including sexual harassment.

Employment of citizens from third countries whose stay is irregular

The hiring or use - even through employment agencies - of foreign workers without the residence permit provided for by current law, or whose permit has expired and for which renewal has not been requested, revoked or annulled within the terms of the law, is not permitted. Each foreign worker, required to have a residence permit or other documentation provided for by current law, undertakes to deliver a copy of this document at the time of hiring, to request renewal from the competent offices well in advance and to communicate the renewal to the company, with the relative expiration date, as well as the failure to renew, revocation or cancellation that may have occurred. The Personnel Office monitors the residence permits of foreign workers employed by the company, with the relative expiration dates and any changes (revocation, cancellation or failure to renew).

In its business activities, the Company intends to avoid any contact with subjects at risk of relationships with criminal organizations and strives to get to know its business partners and suppliers, verifying their commercial and professional reliability.

Crimes against individual personality

It is absolutely forbidden to:

1. recruit labor for the purpose of employing it to work for third parties under conditions of exploitation, taking advantage of the state of need of the workers;
2. use, hire or employ labor, also through the intermediation activity referred to in point 1, subjecting workers to conditions of exploitation and taking advantage of their state of need.

3.4. CRITERIA OF CONDUCT IN SAFETY AND HEALTH

The Company strives to spread the culture of workplace safety, developing awareness of risks and promoting responsible behavior by all employees/collaborators.

The Company is active, mainly with preventive measures, to preserve the health and safety of human resources, as well as to protect all company resources.

As a preventive function of crimes related to health and safety at work (Article 25 septies of Legislative Decree 231/2001) it is expressly mandatory to:

- implement the legislation on safety and health in the workplace (Legislative Decree 81/08);
- respect and implement the regulatory provisions defined by the Consolidated Law on Safety in order to guarantee the reliability and legality of the work environment and, consequently, the physical safety and protection of the moral personality of employees, through compliance with what is defined in the company organizational schemes;
- avoid behaviors that, although they do not in themselves constitute offenses falling among those considered here, potentially increase the risk of offenses occurring.

Decisions, of any kind and at any level, regarding health and safety at work, are based on principles and criteria that can be identified as indicated below:

- a) avoid risks and, where this is not possible, reduce them to a minimum in relation to the knowledge acquired based on technological progress;
- b) assess risks that cannot be avoided;
- c) combat risks at the source;
- d) enhance the contribution of man in carrying out work activity and adequately organize the workplace and equipment and work methods;
- e) take into account the degree of evolution of technology;
- f) replace what is dangerous with what is not dangerous or less dangerous;
- g) plan prevention, aiming at a coherent complex that integrates into it the technique, the organization of work, the working conditions, the social relations and the influence of the factors of the work environment;

- h) give priority to collective protection measures over individual protection measures;
- i) provide adequate instructions to workers.

Every employee/collaborator must contribute to the good management of Safety and Health, always operating in compliance with current legislation, and must not subject other employees/collaborators to risks that could cause damage to their health or physical safety.

Each employee/collaborator is required to attend training/information meetings and collect any informational material produced, use Personal Protective Equipment when prescribed, and adhere to the safety manager's directives.

3.5. CRITERIA OF CONDUCT IN THE PROTECTION OF COMPANY ASSETS

In order to protect company assets, each employee/collaborator is required to operate diligently and with responsible behavior.

In particular, each employee/collaborator must:

1. Use the assets entrusted to him/her with care and thrift;
2. Avoid improper use of company assets, which may cause damage or reduction in efficiency, or otherwise be in conflict with the interests of the Company;
3. Avoid improper use of company assets for purposes and ends unrelated to their duties and work, especially if detrimental to the image and decorum of the Company.

Every Employee or Collaborator is responsible for the protection of the resources entrusted to him/her and has the duty to promptly inform his/her Manager of any events that may cause damage to the Company.

3.6. CRITERIA OF CONDUCT IN RELATIONS WITH THE PUBLIC ADMIN. AND INSTITUTIONS

Relations with Public Bodies and Institutions of any kind must be transparent and consistent with the Company's policy and must be conducted by the company functions formally delegated to do so.

Corruption

The Company does not intervene in the sphere of public powers or in the political sphere to promote third-party interests for the purpose of receiving benefits of various kinds.

Therefore, it is not permitted to offer money or gifts (unless they are gifts or items of modest value, and in any case such as not to prejudice the integrity or reputation of either party and not to be understood as aimed at obtaining improper advantages) or to engage in consulting, sponsorship or advertising relationships or personal assignments with Executives, Officials

or Employees of the Public Administration or their relatives, whether Italian or from other countries.

The aforementioned behaviors are prohibited even if they derive from coercion or inducement by the Public Official or the person in charge of Public Service; in such cases, the Employee has the duty to report this circumstance to his/her immediate superior, who in turn must report it to the Supervisory Body.

The Company considers acts of corruption both illegal payments made directly by Italian Subjects and/or Entities or their Employees, and those made through Subjects acting on their behalf in Italy or abroad.

In relation to any relationship with the Public Administration or individuals in charge of a public service, it is forbidden to offer and/or accept any object, service, benefit, sum of money, or other utility for the performance of acts contrary to or in accordance with one's office.

When a business negotiation, request, and/or relationship with the Public Administration is in progress, the Personnel in charge must not attempt to influence the decisions of the Counterparty, including Officials who handle or make decisions on behalf of the Public Administration.

In the specific case of carrying out a tender with the Public Administration, operations must be conducted in compliance with the Law and correct commercial practice.

If the Company uses a Body and/or third Party to be represented in relations with the Public Administration, the same directives valid for the Company's Employees are applied to the latter, its Employees and/or Collaborators.

Furthermore, the Company may not be represented by third Parties whose collaboration may imply instances of conflict of interest.

In particular, and by way of example, in relations with representatives of public Institutions and the Public Administration in general, whether Italian or foreign, it is forbidden to:

- promise or grant disbursements of money for purposes other than institutional ones;
-
- promise or grant favoritism in the hiring of personnel, in the selection of suppliers of goods and services, in the communication of information and documents.

Contributions, subsidies and public funding

The declarations made to public entities for the purpose of obtaining disbursements, contributions or funding, as well as any documentation used for the reporting of the service, must contain only truthful information.

It is forbidden to:

- produce false or altered documents and/or data or omit due information, also for the purpose of obtaining contributions/subsidies/funding or other disbursements from the State or Public Bodies or the European Community; this prohibition also applies in the

event that contributions/subsidies/funding/disbursements are received by customers in relation to products supplied by the Company;

- allocate public contributions/subsidies/funding to purposes other than those for which they were obtained;
- access in an unauthorized manner the information systems of the Public Administration to obtain and/or modify information for the benefit of the Company;
- submit untrue declarations to public, national or community bodies in order to obtain public disbursements, contributions or subsidized funding, or to obtain concessions, authorizations, licenses or other administrative acts.
- allocate sums received from public, national or community bodies, as disbursements, contributions or funding, to purposes other than those for which they were assigned.

Those who perform a control and supervision function over obligations related to the performance of the aforementioned activities (payment of invoices, allocation of funding obtained from the State or from community bodies, etc.) must pay particular attention to the implementation of the obligations themselves by the persons in charge.

Informatic fraud

The sending of IT or telematic communications to the Public Administration and the receiving of IT or telematic communications from the Public Administration are reserved exclusively to the designated personnel, in accordance with the authorization system in place at the Company. This personnel is authorized to use the company's IT and telematic systems based on the access profiles assigned to them.

Anyone operating in the name of the Company is prohibited from using, for the processing of data and information relevant for the purposes of relations with the Public Administration, and/or for sending IT or telematic communications to the Public Administration or for receiving documents, instruments other than those of the company as assigned above by the Company or made specifically available, on a one-off basis or from time to time, by the Public Administration itself.

In any case, it is forbidden to communicate electronic documents to the Public Administration by means other than the PEC box, or to send communications to the Public Administration via PEC box to which is attached an electronic document not bearing the digital signature of the person in charge of the signature.

Anyone is expressly forbidden to

- i) engage in relations with the Public Administration that involve IT or telematic communication in the name of, or from the Public Administration to, the Company, or
- ii) operate in any capacity on data, information, or programs contained in an IT or telematic system (owned or otherwise available to the Company, or the Public Administration itself), to alter in any way the functioning of an IT or telematic system or to intervene without the right, in any way, on data, information or programs contained in an IT or telematic system, or pertaining to them, for the purpose of procuring for himself or others an unfair profit with damage to others.

It is forbidden to alter the functioning of an IT or telematic system of the Public Administration or to manipulate the data contained therein for the purpose of obtaining an unfair profit.

3.7. CRITERIA OF CONDUCT IN RELATIONS WITH PUBLIC SUPERVISORY AUTHORITIES

Relations with public supervisory authorities, whether Italian, EU or foreign, are based on utmost cooperation, transparency and fairness. The Company fully and scrupulously implements the obligations towards the aforementioned Authorities and actively collaborates during inspection activities.

It is forbidden to exercise directly or indirectly undue pressure (in any form exercised or attempted) aimed at inducing the judicial Authority to favor the Company in deciding the dispute.

3.8. CRITERIA OF CONDUCT IN RELATIONS WITH THE JUDICIAL AUTHORITY

The Company appears in court in the person of its legal representatives, who represent it with loyalty and transparency, making use of competent lawyers with proven ethical integrity. In no way may the importance of the case justify the direct or indirect exercise of undue pressure (in any form exercised or attempted) aimed at inducing the judicial Authority to favor the Company in deciding the dispute.

Anyone who requests their subordinates not to provide the requested information or to provide information that does not correspond to the truth will be sanctioned.

In relations with the judicial Authority, the Recipients and, in particular, those who should be investigated or accused in criminal proceedings, even related, concerning the work activity carried out in the Company, are required to freely express their representations of the facts or to exercise the right not to answer granted by law.

The Company expressly prohibits anyone from coercing or inducing, in any form and with any means, in the mistaken interest of the Company, the will of the Recipients to respond to the judicial Authority or to avail themselves of the right not to answer.

Inducement not to make statements or to make false statements to the judicial authority

In the event of a request or ascertainment by the judicial Authority (or delegated Judicial Police), the utmost cooperation and transparency must be provided, without reticence, omissions or statements that do not correspond to the truth. Anyone who requests their subordinates not to provide the requested information or to provide information that does not correspond to the truth will be sanctioned.

Protection of public faith

The Company condemns any behavior aimed at falsely attesting to the public official, in a public deed (or equivalent, such as a substitute declaration of affidavit, self-certification, etc.), facts of which the deed is intended to prove the truth.

By way of example and not exhaustive, the following is expressly forbidden:

- to present to the public official false declarations and/or communications required by law in which it is certified that the requirements provided for by the regulations are met;
- to make false declarations to the customs forwarder in charge of preparing the customs bill (for example, presenting to the Customs Office documentation certifying possession of the status of "Authorized Exporter" to a third country that is not included among those present in the authorization in possession);
- in the context of a substitute declaration of affidavit, to falsely certify that no criminal convictions have been suffered;
- to make a false declaration of being in possession of the requirements for participation in a tender (for example, being in compliance with the payment of contributions);
- to falsely report to the Police Authorities the loss of documents such as a driving license, insurance documents, bank check, credit cards, etc.

Furthermore, the Company condemns any behavior that involves:

- the formation, in whole or in part, of false public deeds or the alteration of public deeds;
- the counterfeiting or alteration of certificates or administrative authorizations, or, by counterfeiting or alteration, the making it appear that the conditions required for their validity have been fulfilled;
- the simulation of a copy of the deeds themselves and their release in legal form;
- the release of a copy of a public or private deed different from the original.

By way of example and not exhaustive, the following is therefore expressly forbidden:

- to falsify a document (driving license, registration certificate, etc.) making it appear that it was issued by a car practice agency;
- to form a false license plate;
- to falsify articles of association of companies by manipulating the notary seal;
- to falsify bank receipts of delegation to tax payments and receipts of postal payments (e.g., alteration of receipts attesting to the payment of car taxes and customs bills);
- to materially falsify the F24 tax payment forms;
- to falsify notarial authentication deeds;
- to destroy the protest documents after they have been drawn up by the presenter of the securities;
- to alter the expiration of the parking time on the receipt issued by the parking meter in the areas designated for parking cars in the municipality.

3.9. CRITERIA OF CONDUCT IN RELATIONS WITH POLITICAL AND TRADE UNION ORGANIZATIONS

The Company refrains from any direct or indirect pressure on political exponents.

In the absence of the conditions listed below, the Company does not provide contributions to parties or political organizations, either in Italy or abroad, nor to their representatives or candidates, and does not sponsor congresses or festivals that have an exclusive purpose of political propaganda.

It is possible to cooperate, even financially, with these organizations if all the following conditions are met simultaneously:

- legality of cooperation;
- clear and documentable destination of resources;
- express authorization, by the Owners of the Company, to manage such relationships within the Company;
- timely communication to the Supervisory Body regarding the cooperation decided and/or carried out.

Any relationship of the Company with the aforementioned organizations or their representatives must be based on legality and maximum transparency, integrity and impartiality, in order to establish a correct dialectic.

3.10. CRITERIA OF CONDUCT IN ENVIRONMENTAL MATTERS

The Company is committed to respecting environmental legislation and implementing preventive measures to avoid or at least minimize the environmental impact aimed at sustainability.

In waste management activities, the Company requires compliance with the following rules of conduct:

- prohibition of abandonment or uncontrolled dumping of waste or discharge into surface or groundwater;
- prohibition of keeping waste in "temporary storage" outside the requirements and beyond the time limits provided for by law;
- prohibition of mixing waste (in the absence of any suitable authorization);
- prohibition of declaring false information on the nature, composition and chemical-physical characteristics of waste when preparing a waste analysis certificate or prohibition of using a false certificate during the transport of waste;
- prohibition of transferring the waste produced to a treatment plant that is not specifically authorized;

- prohibition of discharging waste of any kind, in the solid or liquid state, into surface or groundwater;
- prohibition of setting fire to waste produced by the company itself, inside or outside the company area, and of setting fire to third-party waste that is found abandoned or deposited;
- prohibition of abandoning and/or depositing waste on which, subsequently, third parties will set fire;
- in the event that waste from third parties is found within the Company's property, treat it as waste produced internally and dispose of it according to the rules governed by the relevant procedure.

In the event of an event potentially capable of contaminating a site, it is mandatory to communicate this circumstance to the competent public bodies.

Every Employee/Collaborator must ensure full collaboration with the competent Authorities, during inspections and/or checks carried out in the company.

Finally, it is expressly forbidden to engage in behaviors that directly or indirectly could potentially lead to the commission of an environmental crime.

Every Employee/Collaborator must contribute to good environmental management, always operating in compliance with current legislation, and must not subject other Employees/Collaborators to risks that could cause damage to their health or physical safety.

3.11. CRITERIA OD CONDUCT IN ACCOUNTING RECORDS

All legal provisions must be strictly observed, also considering the instructions issued by the competent public Authorities, and the policies/procedures adopted by the Company regarding the preparation of tax returns and the liquidation and calculation of taxes.

All actions and operations of the Company must be adequately recorded.

Each operation must have adequate documentary support, in order to be able to carry out checks at any time to certify the characteristics and reasons for the operation and identify the subjects who carried out and recorded the operation itself.

Accounting records must be kept accurately, completely and promptly, in compliance with company procedures regarding accounting, in order to faithfully represent the financial/asset situation and management activity.

All Employees and Collaborators involved in accounting records are required to give maximum collaboration by promptly providing, as far as their competence is concerned, complete, clear and truthful data and information; likewise, all Employees and Collaborators are required to communicate - within the terms established by company procedures - any information in their possession that is relevant for the purposes of accounting records.

By accounting records, we mean all the documentation that numerically represents management facts, including internal expense reimbursement notes. The financial

statements and social communications required by law and by the applicable special regulations must be drawn up clearly and represent the Company's financial and asset situation correctly and truthfully.

Employees are required to promptly inform their Managers and/or the Supervisory Body of any omissions, serious negligence or falsification of accounting and/or documentation on which accounting records are based.

3.12. CRITERIA OF CONDUCT IN CORPORATE MATTERS

Reports, communications, and filings with the Companies Register that are mandatory for the Company must be carried out by the individuals identified by law in a timely, truthful manner and in compliance with applicable regulations.

It is expressly prohibited to prevent or obstruct, through the concealment of documents or other suitable artifices, the execution of legally mandated control or audit activities by Shareholders, other Corporate Bodies, or the Auditing Firm or Auditor.

It is prohibited to engage in simulated or otherwise fraudulent conduct aimed at determining the majority in an assembly.

It is also prohibited, even through disguised conduct, to return contributions made by shareholders or to release them from the obligation to make such contributions, except in cases of legitimate reduction of share capital.

It is prohibited to distribute profits or advances on profits that have not actually been earned or are allocated to reserves, or to distribute unavailable reserves.

It is prohibited to reduce share capital, merge, or demerge in violation of legal provisions protecting creditors.

It is prohibited to artificially create or increase the Company's capital by assigning shares or quotas for amounts lower than their nominal value, through reciprocal subscription of shares or quotas, significant overestimation of contributions in kind or credits, or overvaluation of the Company's assets in case of transformation. Any transaction that may cause harm to Shareholders or Creditors is prohibited. It is also forbidden to carry out real or simulated transactions that could distort the proper formation of supply and demand for financial instruments and to engage in operations that may unduly benefit from the dissemination of incorrect information.

3.13. CRITERIA OF CONDUCT IN ANTI-MONEY LAUNDERING MATTERS

The Company condemns any activity involving the laundering of proceeds from criminal activities in any form or manner.

To this end, its Directors, employees, collaborators, and third parties acting on behalf of and/or in the name of the Company are required to comply with and apply Italian and EU anti-money laundering laws, with an obligation to report to the competent Authority any operation that may constitute such a crime.

In particular, Directors, executives, and individuals operating in at-risk areas must ensure compliance with laws and regulations in every geographical and operational context concerning measures to limit the use of cash and bearer securities in transactions.

It is prohibited to transfer cash or bearer securities when the value of the operation, even if fragmented, equals or exceeds the legally prescribed limit. Any conduct aimed at facilitating such transfers (e.g., promises or agreements of transfer) is also prohibited.

The Company does not permit business relationships with individuals or entities known or suspected to belong to criminal organizations or to operate outside legal boundaries, such as, but not limited to, entities connected to organized crime, money laundering, drug trafficking, or usury.

The Company aims to protect itself from the risk of purchasing materials originating from illicit activities.

Business activities must adhere to transparency criteria, especially in selecting Suppliers, by carefully verifying information concerning third parties with whom the Company engages in financial or commercial relationships, particularly if there is any suspicion of the commission of a predicate offense to self-laundering.

It is strictly forbidden to grant compensation to external consultants that is not adequately justified in relation to the type of assignment performed or to be performed.

3.14. CRITERIA OF CONDUCT IN THE USE OF THE INFORMATION SYSTEM

It is prohibited to:

- Use the Information System for illegal activities or activities that may cause damage to the Company, its collaborators, suppliers, customers, third parties, the State, or other public entities;
- Intercept third-party communications or IT communications;
- Use the Information System to disseminate programs (viruses, chain letters, etc.) that may damage or interrupt an IT system;
- Use, communicate, or disclose information, knowledge, and data acquired or processed without specific authorization from a superior or the competent function;
- Illicitly access an IT or telematic system;
- Illicitly disclose access codes to IT or telematic systems.

The Company complies with copyright laws.

The Company prohibits the possession, reproduction, commercialization, distribution, or sale of copies of software protected by intellectual property laws without the authorization of the rights holder.

Specifically, the Company does not allow the use of intellectual works lacking necessary markings or with altered or counterfeit markings and prohibits the reproduction of computer programs and database contents, as well as the appropriation and dissemination of protected intellectual works, including through disclosure before they are made public.

3.15. CRITERIA OF CONDUCT IN MATTERS OF PRIVATE CORRUPTION

It is expressly prohibited to:

- Offer or promise money to anyone, for themselves or others, in exchange for performing or omitting acts in violation of their official duties or fiduciary obligations towards the entity they serve, to the detriment, even potentially, of such entity;
- Grant or promise other advantages under the same conditions.

The duty of loyalty, whose violation constitutes an element of the crime of private corruption under Article 2365 of the Civil Code, is regulated by Article 2105 of the Civil Code, which states: "The employee must not engage in business, on their own behalf or on behalf of third parties, in competition with the employer, nor disclose information relating to the organization and production methods of the company or use them in a way that may harm it."

The duty of loyalty, therefore, consists of the worker's obligation to maintain loyal behavior towards the employer and to protect its interests in every possible way. Any conduct in contrast with the duties connected to being part of the Company, which is capable of irreparably harming the trust underlying the relationship, constitutes a violation of the duty of loyalty.

By way of example, violations of the duty of loyalty include and are therefore prohibited:

- The premeditation of an activity contrary to the interests of the Company, even if only potentially harmful;
- The misappropriation of confidential corporate documents;
- Engaging in entrepreneurial activities in competition with the Company, even outside the cases of unfair competition provided for by Article 2598 of the Civil Code;
- The disclosure of confidential information, including:
 - Technical methods for conducting business, the use of discoveries and inventions, the technical characteristics and performance of machinery, projects for modification and renovation of facilities;
 - The organization of advertising and competition concerning other companies;
 - Unpublished financial statements, administrative and financial data relating to company management;
 - Personnel management, employee performance evaluation methods, merit increases, and individually granted benefits;
 - Relations with administrative authorities, public entities, trade unions, suppliers, and customers in general;
 - Board of directors' resolutions and the reasons behind the decisions made by the governing bodies;
 - General correspondence.

The violation of obligations inherent to one's office also constitutes a constitutive element of the criminal offense of private corruption.

Such obligations include all obligations imposed on the corrupted party by law or any other regulatory, normative, or ethical act.

Only the offering, granting, or receiving of gifts or customary benefits of modest value is permitted, provided that they do not compromise the integrity or reputation of either party and cannot be interpreted as aimed at obtaining the aforementioned improper advantages.

The Company considers corrupt practices to include both illicit payments made directly by Italian entities and/or their employees and those made through intermediaries acting on their behalf in Italy or abroad.

Furthermore, it is expressly forbidden to accept the giving or promise, for oneself or others, of money, gifts, or other benefits in exchange for the performance or omission of acts in violation of one's office duties or the duty of loyalty towards the Company, causing, even potentially, harm to the Company.

3.16. CRITERIA OF CONDUCT IN TAX MATTERS

The Company ensures:

- Full compliance with legal and regulatory provisions, adopted accounting principles, and corporate procedures in carrying out activities aimed at financial statement preparation and periodic accounting reports;
- That every transaction is not only correctly recorded but also authorized, verifiable, legitimate, and consistent with reference documentation;
- The performance of all controls required by corporate procedures or otherwise deemed appropriate based on the subjective characteristics of the third party with whom the Company interacts or the objective characteristics of the transaction;
- The implementation of all controls established by corporate procedures in managing active and passive invoicing (specifically verifying compliance with authorization levels, the documentation of services performed by or for the Company);
- The verification of the actual performance of services rendered by third parties (e.g., consultants, suppliers);
- The timely fulfillment of tax obligations;
- The traceability of the decision-making, authorization, and control process in financial statement closure, financial statement preparation, and tax determination;
- The verification of the identity of the entity issuing the invoice and the entity providing the goods and/or services;
- The verification of the consistency between the customer and the recipient of the invoice;
- The monitoring of tax deadlines;
- The periodic review of ongoing tax disputes and the Company's tax-related receivables and payables;

- The use in tax returns and payment forms (F24) exclusively of existing and due tax credits;
- That the recording, transmission, and aggregation of accounting information for the preparation of corporate communications, whether mandatory or not, and for the preparation of tax returns, are conducted in a manner that ensures traceability of each stage of the data formation process and the identification of those entering the data into the system.

3.17. CRITERIA OF CONDUCT IN RELATION TO IMPORTS

In managing import activities, the Company ensures:

- Always conducting a prior verification/accreditation/qualification of suppliers (specifically referring to suppliers of imported goods, freight forwarders entrusted with customs operations, and transporters responsible for deliveries);
- Always carefully evaluating the market value, characteristics, and origin of imported goods;
- Ensuring the control of documentation related to import and export operations;
- Verifying the accuracy of customs declarations and identifying the individuals within the Company responsible for their content;
- Complying with customs regulations regarding the entry of goods into and exit from the European Union;
- Verifying the correctness of border duties paid, the existence of exemptions from payment and preferential tariffs, the applicability of special regimes, prohibitions, restrictions, tariff quotas, and any import licenses.

4. EFFECTIVENES OF THE CODE AND CONSEQUENCES OF ITS VIOLATIONS

4.1. COMPLIANCE WITH THE CODE OF ETHICS

Compliance with the provisions of the Code of Ethics must be considered an essential part of the contractual obligations of employees. It must also be considered an essential part of the contractual obligations undertaken by para-subordinate workers, external consultants, and suppliers.

The Company may require compliance with the provisions of the Code of Ethics also from individuals, other than those listed above, who have contractual relationships with the Company (e.g., clients).

The Company's function heads are responsible for ensuring that employees understand and implement the Company's expectations. Function heads must therefore ensure that the commitments expressed in the Code of Ethics are fulfilled.

4.2. REPORTING VIOLATIONS

To ensure the effective application of the Code of Ethics, the Company requires all individuals who become aware of any instances of non-compliance within the Company to report such cases, provided they are useful in identifying conduct that deviates from the Code of Ethics.

Employees must report any violations or suspected violations to their direct superior. If reporting to their superior is ineffective or inappropriate, they must address their concerns to one of the Holders.

Employees are also required to:

- Seek clarification from their supervisors regarding the interpretation and implementation of the provisions of the Code;
- Fully cooperate in verifying possible violations.

The Holders are required to promptly and thoroughly verify the information received and, if the report is substantiated, refer the matter to the appropriate corporate function for the application of any disciplinary measures or activation of contractual resolution mechanisms. The Holders have the discretion to summon and hear the reporting individual and any other involved parties.

For external parties, reports must be sent directly to the Holders.

Reports to the Holders must be made in writing to one of the following addresses:

- Gianbattista Dalli Cani, Viale Vicenza 62/bis, 36071, Arzignano (VI);
- Giancarlo Dalli Cani, Viale Vicenza 62/bis, 36071, Arzignano (VI);

Regarding reported or attempted violations of the provisions of the Code of Ethics, the Company ensures that no one, within the workplace, will suffer retaliation, unlawful pressure, discomfort, or discrimination for having reported a violation of the Code of Ethics or internal procedures. Any form of retaliation against individuals who have made good faith reports of potential violations of the Code of Ethics is itself a violation of the Code. Furthermore, knowingly making false accusations against colleagues also constitutes a violation of the Code of Ethics.

4.3. SANCTIONS

Violating the principles set forth in the Code of Ethics and corporate procedures undermines the trust relationship between the Company and those who commit the violation.

Once verified, violations will be dealt with decisively, promptly, and immediately, through the adoption of appropriate and proportionate disciplinary measures, in accordance with the applicable legal framework, regardless of the potential criminal relevance of such behavior or the initiation of criminal proceedings in cases where the act constitutes an offense.

Disciplinary measures for violations of the Code of Ethics are adopted by the Company in line with applicable laws and relevant national or corporate employment contracts. These measures may also include the dismissal of responsible parties.

For individuals who do not have an employment relationship with the Company, violations of the Code of Ethics will be sanctioned through the application of civil remedies provided by law.

To protect its image and safeguard its resources, the Company will not engage in any form of relationship with individuals who do not intend to operate in strict compliance with the applicable regulations and/or who refuse to adhere to the values and principles set forth in the Code of Ethics.

4.4. DISSEMINATION OF THE CODE OF ETHICS

This Code is made available to corporate bodies, Company employees, consultants, collaborators, all individuals who may act on behalf of the Company, and those who maintain other relationships with the Company, including through its publication on the corporate website.

The updated digital copy is made available to all employees and collaborators. A copy may be requested from the Company's Quality Manager.

Updates and revisions of the Code of Ethics are approved by the Company's Holders.

To ensure the correct understanding of the Code of Ethics, an information plan is developed to ensure its complete dissemination and explanation.

5. REFERENCES

- Legislative Decree of June 8, 2001, No. 231, and subsequent amendments.
- Confindustria Guidelines for the Construction of the Organizational Model pursuant to Legislative Decree 231/2001 - edition of March 31, 2008.
- Consolidated Safety Act (Legislative Decree 81/08).