



OMAC ITALY S.R.L.

Code of Ethics

REVISION	DATE APPROVAL	BODY/FUNCTION	SUBJECT / DESCRIPTION OF CHANGES
00	15/12/2023	Shareholders' Meeting	Implementation of the Code of Ethics

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1. Implementation and revisions

This document has been fully read, shared, approved and signed by the Shareholders' Meeting of **OMAC ITALY S.R.L.** (hereinafter, also the "Company") for the first time on 15/12/2023.

This document is fully read, shared, approved and signed by the Shareholders' Meeting **OMAC ITALY S.R.L.** (hereinafter, also the "Company") on 15/12/2023.

At the same time as the adoption resolution, it shall be published together with the Code of Ethics and the "Whistleblowing Procedure" on the Company's website.

2. Introduction

OMAC ITALY is a limited liability company (hereinafter, also Company), with registered office in Chiuduno (BG) Via Pizzo Camino 9 postcode 24060 and operating throughout Italy, specialising mainly in the following sectors:

- Design, consultancy, production and wholesale and retail marketing, both in Italy and abroad, of equipment and machinery for the threading of power lines, railway and telephone areas and underground, as well as agricultural machinery, construction machinery and industrial plants in general;
- Processing and marketing, wholesale and retail, both in Italy and abroad, of raw materials and industrial semi-finished products in general, of articles, equipment and precision machinery and any other product related to the exercise of the mechanical workshop activity;
- Transformation, set-up and equipment of industrial and special vehicles for civil and industrial services;
- Production and marketing of trolleys and trailers of all kinds also equipped with electric traction and energy storage systems and all their accessories.

In this context, the Company has considered it appropriate to adopt its own Code of Ethics including the lines of conduct to which the Directors, employees, collaborators, suppliers, consultants, contractors and subcontractors, the Public Administration, intermediaries and all stakeholders who have institutional and/or economic or commercial relations with the Company shall be inspired and abide by.

3. General principles

3.1. Purpose

The Code of Ethics and Conduct is the set of values, principles and rules of conduct that shall inspire all those who operate, collaborate and act for or with the Company in the conduct of business and in the performance of company activity, both inside and outside the perimeter of the workplace.

The Code of Ethics and Conduct is the indispensable tool on which the activities of control and monitoring of the company's economic, financial and social relations are based, with particular attention to external relations and as an unavoidable supervision in the management of internal relations and controls.

The main objective of the Code of Ethics and Conduct is to guide and standardise the behaviours of all subjects, at all levels, in the performance of the functions of their competence and responsibility, both in internal and external relations, in compliance with the general and higher principles of transparency, good faith, fairness, honesty, loyalty and impartiality.

The Code of Ethics and Conduct, however, does not intend to describe in an exhaustive manner the specific behaviours that shall be adopted in the face of any situation that may arise, but rather aims to enunciate a series of principles and general guidelines to be followed by the recipients of the Code of Ethics itself, during the course of their work duties.

Therefore, in the absence of a provision containing specific rules of conduct, everyone has the duty to operate and ensure their collaborators and interlocutors operate in ways that are inspired by the highest standards of conduct in compliance with the principles indicated by the Code of Ethics and the laws in force.

The provisions and principles established in the Code of Ethics complement the conduct that the Company's personnel are required to observe in the exercise of their work duties by virtue of current legislation and the national collective bargaining agreement in force at the time of adoption.

3.2. Principles governing business activity

The Company has felt the need to achieve an exhaustive and clear formalisation of the principles to which it recognises positive, primary and absolute ethical value, and to inspire its actions in this regard, committing itself to guaranteeing the values, ethical principles and business conduct, through the most effective and appropriate tools.

These principles represent the fundamental values to which the subjects required to comply with the Code of Ethics and Conduct, without exception, shall adhere in the pursuit of the company's "mission".

In particular, the fundamental ethical principles adopted concern the values and areas of activity listed below.

3.2.1. Legality

The Company intends, in carrying out its activities, to act in compliance with national and EU laws and regulations, the Code of Ethics and Conduct, the Regulations and the company procedures adopted, applying them with rectitude and equity, requiring the Recipients of this Code of Ethics and Conduct to comply with the requirements and to behave in a manner that does not affect the moral and professional reliability of the Company.

For this purpose, no form of conditioning may be implemented that may tend to influence the declarations to be made to the Supervisory Authorities and the Judicial Authorities.

3.2.2. Fairness

This principle implies the commitment, on the part of all Recipients, to respect, in the fulfillment of their functions, the rights of each person involved in work and professional activities.

Recipients have the obligation to act correctly, also in order to avoid, with the utmost care, situations that generate or may generate situations of conflict of interests.

In addition, any situation shall be avoided in which an employee, director or other recipient may derive an undue advantage and/or profit, including through an intermediary, from opportunities known during and by reason of the conduct of its own business.

3.2.3. Impartiality

The Company repudiates all discrimination based on gender, religion, nationality, personal and political opinions, age, health or economic conditions of its interlocutors.

3.2.4. Honesty

Recipients shall not pursue personal or Company profit in violation of the laws and regulations in force, as well as the provisions contained in this Code of Ethics.

3.2.5. Integrity

All Recipients are required to base their conduct on the principles of good faith, honesty, moral integrity, transparency, fairness and impartiality.

3.2.6. Transparency

The principle of transparency is based on the truthfulness, accuracy and completeness of information, both outside and inside the Company.

In compliance with the principle of transparency, every operation and transaction shall be properly recorded, authorised, verifiable, legitimate, consistent, and appropriate.

All actions and operations shall have adequate traceability, such as to be able to guarantee the possibility of verifying the decision-making process, authorisation and conduct.

3.2.7. Efficiency and cost-effectiveness

In every work activity, the cost-effectiveness of the management and use of the Company's resources shall be pursued, in compliance with the most advanced quality standards.

The Company also undertakes to safeguard and preserve the resources, assets, and in general the tangible and intangible assets of the Company, taking all necessary precautions to ensure full compliance with the laws and regulations in force.

3.2.8. Competition

The Company recognises the value of competition when based on respect for the principles of fairness, fair competition and transparency towards operators in the market, and undertakes not to damage the image of competitors and the services offered by them through denigrating acts or actions.

3.2.9. Privacy protection

The Company undertakes to protect the privacy of all the subjects with whom it works, in compliance with current regulations and company operating instructions, in order to avoid the processing of personal data in the absence of the consent of the data subject, as well as for indeterminate purposes or illicit purposes.

3.2.10. Value of human resources

Human resources are recognised as a fundamental and indispensable factor for the Company's development.

The Company therefore recognises the centrality of human resources, from which professionalism, dedication, loyalty, honesty and a spirit of collaboration are required.

The Company protects professional development in order to increase the wealth of skills of its employees and collaborators.

The recognition of salary increases or other incentive instruments, as well as access to higher levels and positions, are linked, in addition to the rules established by law and the collective labour agreement applied, to the merits of employees, such as the ability to express organisational behaviours based on the Company's ethical principles.

The Company also undertakes not to promote forms of clientelism and nepotism.

Employees are recruited only with regular employment contracts. Illegal employment is not tolerated.

3.2.11. Customer focus

The Company has the firm will to achieve the satisfaction of its customers, with the commitment to establish loyal and collaborative relationships with them and with the aim of proposing itself as a reliable, competent and reliable partner.

Moreover, transparent relations shall also be guaranteed with:

- communities;
- local authorities and public institutions;
- associations, trade union organisations and political parties.

The Company does not provide contributions, direct or indirect, for the financing of political parties, movements, foundations, associations and committees and political organisations, or their representatives or candidates.

The Company also does not finance associations, nor does it sponsor events or congresses that have political propaganda as their purpose.

The Company undertakes to guarantee:

- protection of the individual person;
- protection of health and safety at work;
- environmental protection, promoting respect for the environment, understood as a common resource to be safeguarded for the benefit of the community and future generations with a view to sustainable development;
- protection of transparency in commercial transactions, through communication activities that respect the laws, rules and practices of professional conduct, and abides by the principles of clarity, transparency, timeliness and accuracy.
- All actions, operations, transactions and in general all behaviours held in the context of carrying out the Company's activity shall be inspired by the general principles listed above and shall be carried out with the utmost diligence, collaboration, fairness, loyalty, honesty, moral and professional rigour.

3.3. Recipients

The Code of Ethics and Conduct applies to all Company Functions, regardless of the role and hierarchical level and therefore formally engages employees with a subordinate employment relation, independent and/or para-subordinate collaborators, members of corporate bodies and subjects who for any reason perform work or professional activity, even of an occasional nature; it also applies to suppliers, customers, other companies, contractors and subcontractors, work providers and any other subject that has relations, also of an institutional nature, with the company itself.

The aforementioned subjects will be defined, in this document, as "Recipients" or, individually, "Recipient".

3.4. Contractual value of the Code of Ethics

Compliance with the rules of the Code of Ethics and Conduct shall be considered an essential part of the contractual obligations of company employees, pursuant to and for the effects of the provisions of article 2104 et seq. of the Civil Code.

Violation of the rules of this Code of Ethics and Conduct damages the relationship of trust established with the company and will be sanctioned proportionately to the seriousness of the infraction committed, in accordance with as expressly provided for by the disciplinary system, without prejudice to the obligation of employees to comply with the rules provided for by the National Collective Bargaining Agreement (CCNL) and the Workers' Statute (Law number 300 of 1970).

Violations committed by third parties (collaborators, consultants, suppliers, customers, etc.) will be sanctioned according to the provisions of the disciplinary system or in derogation according to the criteria provided in the specific clauses (express termination and/or application of penalties) introduced in contracts with third parties in order to ensure that they operate in compliance with this Code of Ethics and Conduct.

4. Method of implementing the Code of Ethics

4.1. Dissemination

The Company undertakes to disseminate knowledge of the principles established in this Code of Ethics and Conduct, by delivering and/or sending it to the recipients referred to in the previous paragraph.

The company is committed to ensuring the dissemination of the Code of Ethics through publication on its website.

4.2. Principles of conduct for Personnel

The Company's Personnel are required to be fully aware of the Code of Ethics and the principles contained therein, as well as to keep up to date with any subsequent adjustments.

Personnel, in carrying out their work, shall comply with the standards and principles referred to in the Code of Ethics and Conduct, refraining from any conduct that does not comply with it.

Personnel have the right and duty to consult their managers for any clarification regarding the interpretation and correct application of the rules and principles contained in the Code of Ethics.

Personnel, limited to their competences and attributions, are also required to inform the third parties with whom they have relations in the course of their work of the existence and specific contents of the Code of Ethics and Conduct within the Company.

4.2.1. Obligation to update

In carrying out the activity on behalf of the Company, Personnel are required to always maintain a high degree of professionalism and to undergo constant updating with regard to professional training and knowledge of the Code of Ethics and internal procedures.

4.2.2. Confidentiality

Personnel shall treat with absolute confidentiality, even after the termination of the employment relationship, data, news and information in their possession, avoiding dissemination or use thereof for their own or third-party speculative purposes.

Confidential information may be disclosed, within the Company, only to those who actually need to know it for work reasons.

4.2.3. Diligence in the use of company assets

Personnel shall protect and preserve the company values and assets entrusted to them, and contribute to the protection of company assets, avoiding situations that may negatively impact the integrity and safety of such assets.

In any case, Personnel shall avoid using the company's resources, assets or materials for their own benefit, or otherwise for improper purposes.

Any use of said assets and resources that may be contrary to the interests of the Company or that is dictated by professional reasons unrelated to the employment relationship is prohibited.

Under no circumstances may corporate assets be used, in particular with regard to corporate IT equipment, to commit or induce the commission of offences or to pursue any purpose contrary to applicable law or that may constitute a threat to public order, the protection of human rights or morality.

Everyone is personally responsible for maintaining the security of the company's IT equipment and the confidentiality of their access credentials in order to avoid fraudulent or improper use thereof.

4.2.4. Financial statements, accounting and other company documents

Personnel shall pay particular attention to the recording, registration of accounting documents, preparation of financial statements, accounting control process and correct allocation and storage of other corporate documents.

In this regard, it is necessary to ensure:

- adequate collaboration between the company functions responsible for drafting company documents;
- completeness, clarity and accuracy of data and information provided; compliance with the official principles of compilation and registration of all accounting documents;
- correct communication and information between the corporate bodies and the company functions in charge of the accounting area, control and preparation of the financial statements.

4.2.5. Health and Safety at work

Personnel shall take care of their own health and safety and that of other people in the workplace who are affected by their actions or omissions, in accordance with the training, instructions, procedures and means provided by the Employer.

In addition, Personnel are obliged to:

- contribute, along with the Employer and the Function Managers, to the fulfilment of the obligations required for safeguarding health and safety in the work place;
- observe the provisions and instructions given by the Employer and the Function Managers for the purposes of collective and individual protection;
- correctly use work equipment, internal handling means and company vehicles;
- use the personal protective equipment provided by the Employer appropriately;
- immediately report to the Employer or to the Function Managers any deficiencies in the vehicles, equipment and devices referred to in letters c) and d), as well as any dangerous condition of which they become aware, working directly, in case of urgency, within the scope of their skills and possibilities to eliminate or reduce situations of serious and imminent danger;
- take care of the means of personal protection made available, without making any changes on their own initiative and reporting any defects or inconveniences to the Employer;
- not carry out on their own initiative operations or manoeuvres that could compromise their own safety or that of other workers;
- take part in training and information programmes organised by the Employer;
- periodically interface and cooperate with the Company Functions of the RSPP (Responsible for Service of Prevention and Protection) and the RLS (Responsible for Labourer Safety); undergo the health checks provided for by current legislation or in any case ordered by the Company Doctor.

For the powers, duties and tasks of each figure concerning Occupational Safety, refer to Legislative Decree 81/08.

4.2.6. Anti-Money Laundering / Receiving

Personnel shall adopt all appropriate tools and precautions to ensure the transparency and fairness of business transactions.

In particular, it is mandatory that:

- assignments conferred to any service companies and/or natural persons who take care of the economic/financial interests of the Company (suppliers, consultants, customers, collaborators) are drawn up in writing, with an indication of the contents, agreed economic conditions and clause of cancellation of the contract in case of violation of the principles established in this Code of Ethics;
- competent Function Managers ensure control of the regularity of payments to all counterparties;
- minimum requirements established and required for the selection of bidders of the goods and/or services that the Company intends to acquire are scrupulously respected;
- criteria for evaluating tenders are established as part of the company procedures adopted for these activities;
- with reference to the commercial/professional reliability of suppliers and consultants or collaborators, all the information necessary for the pre-assessment thereof is requested and obtained, any inclusion in the appropriate register (if established) and in compliance with the company procedures adopted;
- in the event of the conclusion of agreements aimed at making investments, maximum transparency is guaranteed.

5. Conduct in business

5.1. Relations with suppliers, customers, financial institutions and other companies

In business relations with suppliers, with customers, with financial institutions and with other companies, the Company's Personnel are required to adopt conduct in accordance with the principles referred to in this Code of Ethics and Conduct.

In particular, in relations and business relationships with such subjects, conduct that may cause prejudice or damage, even indirect, to the company, or favouritism aimed at benefiting one subject over others or solicitations aimed at acquiring personal and/or career advantages, for themselves or for others, contrary to current legislation or the provisions contained in this Code of Ethics and Conduct, are not allowed.

The Code of Ethics and Conduct also applies to Third-Party Recipients, or to subjects, outside the Company, who operate, directly or indirectly, for the achievement of the Company's objectives (by way of example and not exhaustively, prosecutors, agents, collaborators in any capacity, consultants, suppliers, contractors and subcontractors, business partners, etc.).

These subjects, within the limits of their respective competence and responsibility, are obliged to comply with the provisions of the Code of Ethics, which is an integral and substantial part, including the ethical principles of reference and the rules of conduct dictated for Personnel.

For this purpose, the inclusion is required, in letters of assignment and/or in negotiating agreements, of special clauses to confirm the third party's obligation to comply fully with the Code of Ethics and Conduct, as well as to provide, in case of infringement, the warning to timely compliance with the Code of Ethics, or the application of penalties or, again, the termination of the contractual relationship.

The Company provides clear, accurate and truthful information in commercial negotiations and respects contractual obligations, as well as the diligent fulfilment thereof, preventing conduct that may mislead the customer. Contracts and communications with customers shall:

- be clear, simple and formulated with language as close as possible to that used by customers, so that they can make informed choices;
- ensure certain dates for contracts, in the forms and methods provided for by law;

- comply with current regulations with particular attention to the application of anti-corruption legislation.

The Company undertakes to communicate promptly and in the most appropriate manner all information relating to possible modifications and variations in the performance of activities.

5.2. Relations with the Judicial Authorities

In relations with the Judicial Authorities, it is expressly forbidden to engage in, or incite others to engage in, corrupt practices of any kind.

In the event that the Company is involved in judicial or extra-judicial proceedings in civil, criminal, administrative, tax or preventive measures, internal personnel, or anyone acting in the name of and/or on behalf of the Company, shall not in any way adopt conduct towards the Judicial Authorities, registry officials or Judicial Officers, capable of inducing such subjects to adopt measures that are unlawfully for the benefit of the Company.

With regard to any requests of any kind from the Judicial Authority and in general in any contact with the same, the Company undertakes to provide the utmost cooperation in making truthful and representative statements of the facts, refraining from any conduct that may impede or hinder the activity of the Judicial Authority, in absolute compliance with the laws and in accordance with the principles of loyalty, fairness and transparency.

All Recipients involved in legal proceedings shall provide effective cooperation and make truthful, transparent and representative statements of the facts.

It is explicitly forbidden to:

- carry out any activity that may favour or harm any of the parties in the course of the proceedings;
- condition, in any form or manner whatsoever, the will of persons called upon to answer to the Judicial Authority in order not to make statements or to declare facts that are untrue;
- promise or offer money, gifts or other types of benefits to persons involved in legal proceedings or persons attributable to them.

6. Internal controls, corporate communications and operation of corporate bodies

6.1. Internal controls

All activities carried out within the Company shall be legitimate, properly recorded and documented (in paper and/or computer format), verifiable, authorised, consistent, congruent and compliant with current legislation, as well as company procedures and regulations, including the provisions and principles contained in this Code of Ethics and Conduct.

The Company's internal control system aims to:

- ensure the accuracy and reliability of the accounting records and supporting documentation, as well as the process of preparing the financial statements in compliance with the provisions of the Civil Code, tax regulations and all applicable legislation;
- periodically check the adequacy of the company's procedures and organisation in terms of effectiveness of supervision, efficiency and cost-effectiveness, as well as consistency with current legislation;
- verify and ensure the correct functioning of the Corporate Bodies in compliance with current legislation;
- ensure compliance of operational requirements with internal procedures and regulations, with applicable legislation, as well as with the principles and provisions contained in this Code of Ethics and Conduct.

Internal control within the Company is carried out by the Directors and individual Function Managers.

6.2. Functioning of corporate bodies

The procedures for convocation, functioning and minutes of the Shareholders' Meeting and the Administrative Body shall be inspired by criteria and procedures that guarantee maximum information for all interested parties, with particular regard to meetings that may have a significant impact on the economic and financial situation and on corporate structures.

6.3. Relations with shareholders

The company organisation, aware of the importance of the role played by members, is committed to providing accurate, truthful and timely information, and to improving conditions of participation, within its prerogatives, in company decisions.

It is the Company's commitment to protect and increase the value of its business, in light of the commitment made by shareholders with their investments, through the enhancement of management, the pursuit of high standards in productive uses and capital solidity.

The corporate organisation also undertakes to safeguard and preserve corporate resources and assets.

7. Human Resources

7.1. Introduction

Human Resources are an indispensable element for the very existence of the company and for the type of activity carried out by the same.

The dedication, loyalty and professionalism of human resources are values and conditions that are decisive for achieving objectives and business success.

7.2. Personnel selection

The evaluation of the Personnel that the company should hire, is carried out on the basis of the correspondence of the profiles of the candidates with respect to those expected and to the actual organisational needs, in compliance with the principles of impartiality and equal opportunities for all those involved, and in compliance with the company procedures adopted.

All Personnel shall be hired with a regular employment contract and no form of irregular or undeclared work is allowed.

At the time the collaboration relation begins, employees/collaborators shall receive comprehensive information regarding the characteristics of their duties and function, the regulatory and remuneration aspects and the regulations and conduct necessary for handling health, safety and privacy risks, and receive mandatory training in these areas.

They shall also explicitly accept their commitments deriving from this Code of Ethics and Conduct.

7.3. Relations with collaborators and consultants

The company identifies and selects collaborators and consultants with absolute impartiality, autonomy and independent judgement, based on the analysis of the "curricula vitae" and the professional figures sought within the procedures adopted.

Conduct contrary to the principles expressed in the Code of Ethics and Conduct can be considered a serious breach of the duties of fairness and good faith in execution of the contract, a reason for damage to the fiduciary relation and just cause for termination of contractual relations.

Collaborators and consultants who have relations with the company are required to avoid any situation of conflict of interest with the same, undertaking, in case of conflict, to report it immediately to the Company.

7.4. Rights and duties of employees

The Company's employees are required to comply with the rules and provisions contained in the relevant applicable employment contract, the rules established by the Civil Code and by the law in force, as well as the principles and provisions contained in this Code of Ethics; these provisions recognise the employee's rights and duties.

In particular, employees shall be entitled, by way of example and non-exhaustively, to:

- economic and regulatory treatment as provided for by the applicable collective labour agreement and by the provisions of current legislation;
- carry out the functions related to their qualification or possibly to a higher qualification in compliance with the laws in force and collective bargaining;
- receive adequate professional training, taking into account the needs and personal characteristics of each person;
- protection of safety and health in the workplace, as well as confidentiality of personal data in accordance with current company regulations, current legislation and the principles contained in this Code of Ethics and Conduct.

Employees have the duty, by way of example and non-exhaustively, to:

- provide the service indicated in the employment or collaboration contract, acting loyally in order to comply with the obligations assumed;
- observe the provisions and instructions given by the Corporate Bodies or by their Department Managers; collaborate with colleagues and with their Company Managers and disseminate and communicate to them data, information, useful and/or necessary knowledge acquired in the exercise of their work, in a correct, clear, complete and exhaustive manner in compliance with the company regulations in force and current legislation;
- ensure all conduct that allows us to operate with maximum efficiency in the execution of the tasks assigned and in the pursuit of common objectives;
- acquire the professional skills essential for the performance of their work and to pursue the continuous improvement of their professionalism through constant updating and participation in courses, seminars, conferences and training programmes proposed and activated by the Company;
- fulfil all the obligations necessary for the protection of safety and health in the workplace, in accordance with current legislation and company provisions on the matter;
- know and observe all the rules on information security in order to guarantee the integrity, confidentiality and availability of data relating to suppliers, customers and any third parties who have relations with the Company;
- correctly use and carefully guard company assets and not use for private purposes equipment, tools, supports and services at their disposal for official reasons, nor allow others to do so;
- refrain from carrying out other activities during working hours that are not congruent with their duties and organisational responsibilities;
- not derive any direct or indirect undue profit or advantage in the performance of their work duties.

The company requires its employees/collaborators to know and observe the provisions of the Code of Ethics and Conduct.

The Company applies the disciplinary sanctions specified in the disciplinary system in the event that it becomes aware of any omission of a report of irregular or unlawful conduct identified to be well-founded; at the same

time, it applies the same disciplinary sanctions in the event that it ascertains an unfounded report made in bad faith, for the sole purpose of causing voluntary damage to colleagues, collaborators and consultants.

The Company shall sanction all conduct by employees in violation of the rules and principles set out in this Code of Ethics and Conduct by applying the disciplinary sanctions provided for by the Disciplinary System.

7.5. Integrity and protection of the person

The Company undertakes to protect the moral integrity of its employees, guaranteeing the right to working conditions that respect the dignity and freedom of everyone, as well as a working environment that values diversity in compliance with the principle of equality.

To this end, the company opposes all types of discrimination of a racial, sexual, political, trade union or religious nature, and imposes the obligation to refrain from adopting conduct or initiatives that create an intimidating, hostile work environment or that negatively interfere with the work performance of others, as well as from any harassing act or conduct towards other workers.

In addition to not allowing any type of sexual harassment and/or conduct or speech that may disturb the sensitivity and/or freedom of the person.

Employees who believe they have been subjected to harassment or have been discriminated against, or who are aware of intimidation, discrimination, acts or harassing conduct towards colleagues, may report the incident to the Company's reporting office (activating the so-called "Whistleblowing Procedure").

8. Health, safety and environment

The Company undertakes to disseminate and consolidate a culture relating to health, safety and the environment in compliance with the provisions of current legislation, with particular attention to developing awareness of risks, promoting campaigns to raise the awareness of personnel, take care of the working environment and the well-being of all those who carry out their work, for whatever reason, in favour of the company.

The Company's Personnel are required to observe the company provisions on health, safety and the environment in order to prevent and/or avoid accidents and any harmful events, as well as the provisions governing access and conduct in the workplace.

As a direct consequence of the above, the Company is committed to maintaining a high level of efficiency and functionality of the company structure.

9. Company assets and asset protection

All recipients of this Code of Ethics and Conduct are required to use and carefully preserve the assets they have for official reasons.

They are directly and personally responsible for the protection and legitimate use of the assets and resources entrusted to them for the performance of their functions, as the different use of the assets and resources owned by the Company is not permitted.

The Company, in compliance with the laws in force, shall take the necessary measures to prevent the distorted use thereof.

In particular, the recipients of this Code of Ethics and Conduct shall use the tangible and intangible corporate assets made available to them:

- with the utmost scruple and in its own way, also in order to avoid damage to property or damage to people;
- exclusively for purposes connected and instrumental to the exercise of work;
- avoiding, as far as possible, waste, tampering or use that may compromise efficiency or accelerate normal deterioration thereof.

All recipients are required to comply with current laws and regulations regarding copyright and the use of computer programmes.

The Company undertakes to ensure compliance with trademarks and distinctive marks, i.e. patents, models or designs, and not to use industrial property rights or intellectual works of third parties except as permitted by law.

The Company undertakes to respect (and binds the Recipients of this Code of Ethics and Conduct to respect) the intellectual property of all third parties who may have relations with it.

10. Confidentiality

The information, data, knowledge acquired and/or managed and/or processed in the course of and during the performance of work activities by company Personnel and by all those who, for any reason, have working relations with the Company, shall remain strictly confidential and may not be disclosed, with particular attention to documents, data and information the dissemination of which could prejudice or compromise, even potentially, the image, interests or, in any case, company activities.

Everyone is required to make confidential use of the information and data of which they become aware in the performance of their task, refraining from taking any personal advantage therefrom, in compliance with current legislation.

In any case, the Company shall treat the information and data with the utmost diligence and attention and shall take the necessary and/or appropriate precautions to prevent the aforementioned information and data from being made accessible to unauthorised persons both in the workplace and outside it.

Such information and data, acquired, managed or processed as part of the performance of the work activity, are the exclusive property of the Company. Therefore, the latter is the only one to have them or to be able to authorise their use.

The information to be communicated to third parties shall be transmitted in an accurate, correct and complete manner. In no case is it permitted to disclose false or biased news or comments; such conduct could have consequences of a compensatory nature, as well as being criminally punishable.

11. Privacy protection and protection of personal data

The Company provides for the processing of data relating to its Personnel, as well as to suppliers, customers and/or third parties in general who are required to manage, in compliance with current legislation on the protection of privacy and protection of personal data.

The company undertakes to adopt all the necessary requirements relating to such data, as well as to adopt security measures to guarantee the confidentiality thereof.

Personnel may not upload borrowed or unauthorised software onto company systems, nor make unauthorised copies of licensed software for personal, company or third-party use. It is necessary to use the computers and IT tools made available by the Company exclusively for company purposes. Consequently, the Company reserves

the right to verify the content of the devices, as well as the correct use of the IT tools in compliance with company procedures.

Furthermore, Personnel are required not to send threatening and insulting e-mails, not to use linguistic expressions that do not conform to the Company's style, or in any case to use inappropriate language.

The Company protects the personal data of those who carry out their activities and of all those who come into contact with the company, avoiding any misuse of such information in compliance with the regulatory provisions on data protection and internal procedures.

The Company ensures and guarantees compliance with the principles of lawfulness and correctness of the processing of data, informing data subjects about the subjects who will carry out the processing, through what methods and for what purposes, in order to obtain consent to the processing of the data as required by current legislation.

The Company also guarantees that the processing of personal data takes place only for specific, explicit and legitimate purposes. Therefore:

- in compliance with the principle of necessity, information systems and computer programmes are configured minimising the use of personal data and identification data, so as to exclude their processing when the purposes pursued in individual cases can be achieved by means of anonymous data or other modalities that allow the identification of the data subject only in case of necessity;
- in accordance with the principle of relevance and non-excess of the processed data, the Company guarantees that the processing and collection of data does not exceed what is necessary for the stated purpose.

The data of which the Company becomes aware are kept in such a way that the identification of the data subject is only possible for a period of time not exceeding that necessary for the purposes for which they were collected and processed.

The Company guarantees the adoption of suitable preventive security measures for the processing of data carried out with or without the aid of electronic means.

In particular, personal data subject to processing is kept and controlled, also in relation to the knowledge acquired on the basis of technical progress, the nature of the data and the specific characteristics of processing, so as to minimise the risks of destruction or loss (even accidental) of the data itself, of unauthorised access or of processing that is not permitted or does not comply with the purposes of the collection.

The Company adopts the appropriate security measures in order to avoid the risk of destruction, loss, unauthorised access or unauthorised processing of data.

The Company respects and demands compliance, both internally and externally, with the principles enshrined in this Code of Ethics and Conduct, in the laws, regulations in force regarding privacy and data protection, and in the internal procedures adopted.

12. Health protection and safety

Aware of the importance of ensuring the best health and safety conditions in the workplace, the Company ensures the dissemination and consolidation of a culture of safety and health of workers in the workplace, developing risk awareness and promoting responsible conduct by all personnel.

All Recipients of this Code of Ethics, within the scope of their duties, participate in this risk prevention and health and safety protection process with respect to themselves, colleagues and third parties.

In particular, both this document and the information regarding the Risk Assessment prepared in accordance with the current legislation on occupational safety (documents that will be periodically reviewed, checked and updated) are available to all personnel, in order to ensure effective disclosure and compliance.

The Company undertakes to promote and disseminate responsible conduct among the Recipients, putting in place the necessary preventive actions, in order to preserve the health, safety and security of all personnel as well as third parties who attend its work environments.

The culture of health and safety is systematically disseminated, through constant training and information courses, defining roles and skills, within the framework of service orders and the company procedures adopted.

The Company guarantees the protection of health and safety at work by complying with the rules set out in Legislative Decree no. 81 of 8 April 2008 and subsequent amendments and additions.

Recipients are required to comply with the rules and obligations regarding prevention and protection at work, setting themselves as objectives of excellence that go beyond mere compliance with the law, in full awareness of the value of safeguarding the health, safety and well-being of the person.

The Company respects and demands compliance – both internally and externally – with the principles enshrined in this code of ethics, in the laws, in the regulations in force regarding the protection of health and safety, in the internal procedures adopted.

13. Environmental protection

The Company, sensitive to environmental protection issues, is active in promoting a culture of respect for the environment among all Recipients.

The Company demands compliance with environmental regulations and promotes the development of a civic sense of respect for the environment on the part of all its employees, its contractors and subcontractors, and all the resources that work for the Company itself.

In particular, in the spirit of the provisions of article 9 of the Articles of Incorporation, the Company makes environmental protection a primary prerequisite in the choices of its technology, programmes and strategies, preventing all forms of pollution and assessing the environmental impacts of any new process, project, work or service offered.

The Company respects and demands compliance, both internally and externally, with environmental legislation, preventing and possibly counteracting all conduct aimed at offending or endangering the protection of the environment, whether understood as soil, water, air, fauna, flora, etc.

14. Dissemination and update of the Code of Ethics

Through the Company Functions in charge, the Company constantly promotes and monitors knowledge of the Code of Ethics and Conduct, the annexed protocols and their updates, as well as the areas of activity of the various functions with attributions of responsibilities, lines of hierarchical dependence, description of tasks and training of personnel.

Information and knowledge of the Code of Ethics and related specific protocols take place through the publication of the same documentation on the company's website

The company's personnel may however, at any time, ask their superiors for advice and clarification on the contents of the Code of Ethics, on the application of the protocols and on the tasks assigned.

It is the task of the Administrative Body to decide on the updating of the Code of Ethics and Conduct in order to adapt it to any relevant new legislation and the evolution of civil awareness.

15. Reporting violations of this Code of Ethics

Please refer to the Whistleblowing procedure.