MA SOLAR ITALY S.R.L.
CODE OF ETHICS

Approval:	24/06/2026

Date	Rev.	Description of changes

TABLE OF CONTENTS

MA Solar Italy srl
A sole shareholder Company

Registered office: Via Torri Bianche 9 – 20871 Vimercate (MB) – Italy
Manufacturing unit: Via San Giorgio 642 – 52028 Terranuova B.ni (AR) – Italy
C.C.I.A.A. Milano Monza Brianza Lodi/ C.F.(Tax code) 13892480966 – REA MB-2750553
VAT 13892480966 – Paid-up capital € 1.010.000,00

T +39 055 91.95.1
masolaritaly@legalmail.it
www.fimer.com

1. INTRODUCTION

1.1 PREAMBLE

Continuous attention to customer needs, professional competence and respect for commitments as constant objectives over time constitute the premises and foundations of the corporate strategy and policy of MA Solar Italy S.r.l. ("**MA Solar**" or the "**Company**"), inspired by the highest possible levels of transparency and quality.

MA Solar Italy S.r.l. has the essential objective of combining the high quality of the products and services offered with the highest ethical standards and compliance with the law in every area of its business activity. To this end, MA Solar Italy S.r.l. has decided to adopt this Code of Ethics and Conduct (the "**Code of Ethics**"), designed as a tool to which all recipients must refer in their daily activities, so that the ethical principles that inspire MA Solar Italy S.r.l. become an integral part of business operations.

1.2 WHAT IS THE CODE OF ETHICS AND CONDUCT?

The Code of Ethics is the tool prepared to express the ethical commitments and values pursued by MA Solar Italy S.r.l. in the management of its activities.

The Code aims to ensure that such activities are inspired, among other things, by principles of honesty, loyalty, integrity, fairness, transparency, equity, diligence, efficiency and legality, and assumes compliance with applicable regulatory and administrative provisions as well as observance of company regulations and procedures.

The Code of Ethics has been prepared to ensure that MA Solar's fundamental ethical values are clearly defined and constitute the basic elements of its management and culture, as well as the standard of conduct for all those who, by operating within the Company or maintaining institutional, professional and economic relations with it, are the natural recipients of this Code of Ethics.

The Code of Ethics is also attached to and forms an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree 231/01 (the "**Model**") adopted by the Company.

1.3 TO WHOM AND WHERE DOES IT APPLY?

The set of ethical principles and rules of conduct set out in this Code of Ethics applies to the Company and must inspire the activities of all those who operate within its sphere of action or who maintain relationships with it in any capacity. The Code of Ethics is therefore binding on the members of the corporate bodies and management, on employees, and on all those who operate, even de facto, for the Company, including third parties such as, by way of example and without limitation, collaborators, consultants, contractors, suppliers, etc. (the "**Recipients**").

Each Recipient is therefore required to read and become familiar with the Code of Ethics, to actively contribute to its implementation and to report any shortcomings and/or non-compliance.

1.4 WHERE CAN IT BE FOUND?

Anyone may access the Code of Ethics in electronic format on the company intranet as well as on the Company's website, for the benefit of external parties such as suppliers, agents, consultants, institutions, entities and third parties in general.

A paper copy of the Code of Ethics may always be requested from the Legal & Compliance Office.

MA Solar also undertakes to promote awareness of the Code of Ethics through dedicated training sessions and to include, in engagement letters and consultancy, collaboration, procurement and agency contracts, appropriate provisions or termination clauses in the event of breaches of the obligations arising from this Code of Ethics.

2. ETHICAL VALUES OF MA SOLAR ITALY S.R.L.

There are corporate values that inspire actions and decisions within the Company and that form the backbone of the Code of Ethics.

2.1 RESPECT FOR THE PERSON, HONESTY AND SAFETY, LOYALTY

The Company requires everyone to act in compliance with laws and rights, as well as with the cultural, political and religious identity of all persons with whom each individual interacts. The centrality of the person is expressed in particular through attention to customers' needs and requests, the enhancement of employees and collaborators, fairness and transparency in negotiations with the Public Administration and suppliers, and active participation in the social life of the community.

2.2 INTEGRITY, FAIRNESS AND TRANSPARENCY

In carrying out its activities, the Company complies with the principles of legitimacy, both formally and substantively, with regard to fairness, respect for rules, transparency, clarity and truthfulness of accounting, production and management records, in accordance with applicable laws and company procedures aimed over time at ensuring their application and control.

2.3 EQUITY AND IMPARTIALITY

In relations with third parties and in personnel management, the Company acts fairly and impartially, adopting the same conduct towards all those with whom it comes into contact, while taking into account the different forms of relationship required from time to time by the nature and institutional role of the interlocutors.

MA Solar Italy srl
A sole shareholder Company

Registered office: Via Torri Bianche 9 – 20871 Vimercate (MB) – Italy
Manufacturing unit: Via San Giorgio 642 – 52028 Terranuova B.ni (AR) – Italy
C.C.I.A.A. Milano Monza Brianza Lodi/ C.F.(Tax code) 13892480966 – REA MB-2750553
VAT 13892480966 – Paid-up capital € 1.010.000,00

T +39 055 91.95.1
masolaritaly@legalmail.it
www.fimer.com

2.4 CONFIDENTIALITY OF PROCESSES, ACTIVITIES AND PERSONAL INFORMATION

The Company requires everyone to maintain the necessary confidentiality regarding information obtained in connection with their activities and ensures confidentiality with respect to all facts, including those no longer current, of which the Recipients of this Code become aware in the course of their work.

2.5 COMPLIANCE WITH LAWS AND REGULATIONS

For the Company, strict compliance with applicable laws and employment and/or collaboration contractual provisions takes priority over business requirements.

2.6 REPORTING

Everyone is encouraged to promptly report any fact, event or conduct contrary to the law, the Company's internal rules and the provisions of this Code of Ethics. Such reports must be made in compliance with the principles of fairness and loyalty that must characterise relationships among employees at all levels, in the forms and manner governed by the procedures adopted by the Company in this area (for further details, please refer to the Whistleblowing Reports Management Procedure adopted by the Company).

2.7 INTERNAL CONTROLS

It is the Company's responsibility to promote, at all levels, a corporate culture characterised by full transparency and cooperation with the bodies responsible for carrying out internal audits and controls.

2.8 COMPANY IMAGE

Everyone must always be committed to acting in accordance with the principles set out in this Code of Ethics in relations among colleagues, with customers, suppliers and third parties in general, maintaining a relationship style based on quality, helpfulness, decorum and courtesy.

3. PRINCIPLES OF CONDUCT

3.1 RELATIONS WITH INSTITUTIONS AND THE PUBLIC ADMINISTRATION

In full respect of their respective roles and functions, the Company maintains relations with public bodies, State and local administrations, public-law organisations, publicly owned companies, etc.

The Company may not derive advantages from the above-mentioned relationships except through the lawful establishment of contractual relationships, through measures lawfully obtained, or through grants or benefits of any kind duly obtained and intended for the purposes for which they are granted.

The relationships referred to in this section, whether maintained by the Recipients or by the Company, must always be inspired by the strictest compliance with applicable laws and regulations, in accordance with the principles of transparency, legality and fairness, and must be based on recognition of the respective roles and organisational structures.

The Company **prohibits** Recipients from offering, or even merely promising, money, other benefits or preferential treatment to representatives of the Public Administration. A zero-tolerance policy applies in this regard.

The offer or promise of money, other benefits or preferential treatment, directly or through family members and/or third parties, may constitute a form of corruption and is therefore absolutely **prohibited**.

More specifically, by way of example, it is **strictly prohibited** to:

- make cash payments to public officials or persons in charge of a public service belonging to the Public Administration, public bodies and/or persons assimilated to them;
- promise or grant preferential treatment in hiring personnel, selecting suppliers of goods and services, or communicating information and documents;
- pay and/or promise, directly or indirectly, money or other benefits to third parties, public officials, persons in charge of a public service, or private individuals;
- maintain relations with officials of the Public Administration and Authorities, representing or acting on behalf of the Company, without the necessary authorisations from the Company and for reasons unrelated to professional purposes and not connected with the assigned duties and functions;
- improperly influence the decisions of public officials;
- produce false or altered documents and/or data or omit required information, including for the purpose of obtaining contributions, subsidies, financing or other grants from the State, public bodies or the European Community;
- allocate public contributions, subsidies or financing to purposes other than those for which they were obtained;
- access the Public Administration's information systems without authorisation in order to obtain and/or modify information for the benefit of the Company.

The Company expressly prohibits any conduct aimed at circumventing the provisions of this article through different forms of remuneration which, through appointments, consultancy engagements, hiring, etc., pursue unlawful purposes.

Gifts or other forms of hospitality in favour of public officials are permitted only where they are of modest value and, in any event, such as not to compromise the integrity of either party and not to be construed as consideration for obtaining advantages in an improper manner. Such expenses, only where necessary, must always be properly documented and appropriately authorised.

All Recipients are required to cooperate loyally with representatives of the Judicial Authority and with any other investigating, inspection or supervisory body, providing all documentation and information requested by them in a complete, adequate and timely manner. In this regard, it is **strictly prohibited** to engage in conduct that may in any way hinder the proper administration of justice. With regard to this point:

- **it is strictly prohibited** to make false statements to the Judicial Authority and/or any other investigating, inspection or supervisory body, or to engage in conduct such as violence, threats, or the offer or promise of money or other benefits that may induce others to make untrue or false statements.
- **it is strictly prohibited** to provide untrue information or omit required information concerning relevant facts in order to influence decisions of the Public Administration or Supervisory Authority in one's favour;
- **it is strictly prohibited** to omit statements, or parts thereof, in the course of judicial proceedings involving the Company in any capacity.

In the event of participation in tenders, Recipients undertake to:

- act in compliance with the principles of fairness, transparency and good faith;
- assess, during the preliminary stage of the tender notice, whether the required requirements are met and whether the requested services are feasible;
- provide truthful and accurate data and information;
- manage relations with public officials in accordance with the principles of transparency and honesty, avoiding conduct that may compromise the other party's judgement and refraining from misleading conduct that could cause the Public Administration or Supervisory Authority to make errors in carrying out technical and economic assessments based on the documentation submitted;
- in the event the tender is awarded, perform what is required under the contractual obligations undertaken.

3.2 RELATIONS WITH CUSTOMERS

The full satisfaction of the needs of its contractual counterparties is a priority objective of the Company, also with a view to creating a solid relationship inspired by the general values of fairness, honesty, efficiency and professionalism. The Company pursues the objective of satisfying its customers by providing them with quality products and services, in full compliance with the rules and regulations applicable to the market in which it operates.

Company personnel and all Recipients of the Model are required to:

- comply with internal procedures for managing customer relationships;
- provide, efficiently and courteously and in compliance with contractual provisions, high-quality services that meet or exceed customers' reasonable expectations and needs;
- provide customers, efficiently and courteously, with accurate and comprehensive information concerning the conditions and subject matter of the various offers;
- provide truthful and accurate advertising or other communications;
- respond to customer suggestions and complaints using appropriate and timely communication systems.

4. RELATIONS WITH SUPPLIERS

The Company bases its relationships with suppliers on principles of transparency, equality, loyalty and fair competition. In its purchasing policies, the Company aims to procure products and/or services by selecting suppliers on the basis of objective assessments concerning quality, price and the supplier's compliance with the highest standards of compliance with applicable regulations (i.e., in matters of health and safety at work and employment law) and with the ethical standards that inspire the Company.

Contracts with suppliers must always be drawn up in writing and in the form prescribed by company procedures, and the remuneration to be paid must be exclusively proportionate to the quantity and quality of the supply provided.

Company personnel are therefore required to:

- comply with internal procedures for the selection and management of relationships with suppliers;
- not prevent any supplier that meets the required requirements from competing for the award of a supply contract, adopting objective evaluation criteria in the selection process, according to clear and transparent methods;
- submit potential suppliers to a structured qualification process that assesses their economic and financial capacity and whether they meet requirements of good standing and ethical conduct;
- comply with the contractually agreed conditions.

To this end, employees participating in these processes must:

- refrain from maintaining relationships with suppliers known not to meet subjective requirements relating to professionalism and good standing;
- verify the absence of conflicts of interest between the supplier and the Company's employees or third parties, such as customers or Public Administration officials, that could undermine transparency in the supplier selection process;
- verify, including through appropriate documentation, that the suppliers under selection are able to meet the Company's needs by having suitable means, financial resources, organisational structures, technical and professional capacity, adequate *know-how*, and regulatory and legal compliance.

4.1 RELATIONS WITH THIRD PARTIES (*BUSINESS PARTNERS*, ETC.)

For the Company, it is of primary importance to deal only with third parties of high standing that comply with appropriate ethical and reputational standards.

For this reason, the Company requires all relevant Recipients to carry out, in advance, appropriate checks on third parties, aimed, among other things, at verifying their good standing and integrity, and to act in accordance with principles of transparency, equality and fairness.

4.2 RELATIONS WITH PERSONNEL

The Company recognises the central role of human resources, in the belief that the main success factor of any business is the professional contribution of the people who work in it. In personnel management, the Company ensures equal opportunities for all, guaranteeing fair treatment based on merit-based criteria, without any form of discrimination.

The search for and selection of personnel is carried out by the Company on the basis of criteria of objectivity, competence and professionalism, ensuring equal opportunities, avoiding any favouritism and aiming to secure the best skills available on the labour market.

Personnel are hired under regular employment contracts and no form of irregular work is tolerated, nor the employment of foreign nationals whose stay in Italy is irregular. The Company also undertakes to protect the moral integrity of personnel, preventing them from being subjected to unlawful pressure or undue hardship. For this reason, any act of psychological violence, as well as any discriminatory attitude or behaviour or any conduct harmful to the person, their beliefs or preferences, is strictly prohibited.

In this regard, sexual harassment or intimidating and hostile attitudes in internal or external working relationships are not tolerated. Anyone who, while performing their activities on behalf of or in favour of the Company, believes that they have been subjected to harassment or discriminated against for any reason may report the matter through the whistleblowing reporting channels made available by the Company, as further described in the Whistleblowing Reports Management Procedure adopted by the Company, it being understood that anyone making a report is protected against any form of retaliation.

The Company does not tolerate anyone performing work duties, during working activities and in the workplace, under the influence of alcohol, narcotic substances or similar substances, or the consumption or transfer of narcotic substances.

The Company, without any discrimination and solely on the basis of merit-based criteria, offers career opportunities to those who possess the characteristics required to access higher roles, functions, assignments or professional profiles, based on the professional competence acquired and demonstrated and, in any case, on exclusively and strictly professional parameters.

It constitutes an abuse of a position of authority to request subordinate persons to engage in any conduct that would amount to a breach of this Code of Ethics or of applicable legal provisions.

The Company protects privacy by complying with the legislation in force on the processing and storage of data, refraining from requesting information concerning employees' private sphere, without prejudice to cases in which such information must be made public by the data subject pursuant to an express legal requirement.

4.3 RELATIONS WITH EXTERNAL COLLABORATORS AND CONSULTANTS

External collaborators are required to comply with the principles set out in the Code of Ethics.

In this regard, Company personnel, in relation to their duties, when dealing with external collaborators and consultants, must:

- comply with the principles of the Code of Ethics and the internal procedures for the selection and management of relationships with external collaborators, ensuring that the relevant selection is based on objective assessments concerning, among other things, the external collaborator's compliance with the highest standards of compliance with applicable regulations and with the ethical standards set out in this Code of Ethics;
- work only with qualified persons and companies of adequate standing;
- promptly inform their Manager in the event of uncertainty regarding possible violations of ethical principles by external collaborators;
- include appropriate compliance clauses in external collaboration contracts.

All agreements with external collaborators must be drawn up in writing. In any event, the remuneration to be paid must be exclusively proportionate to the service indicated in the contract and, in any case, to the professional skills and the actual service performed.

4.4 RELATIONS WITH COMPETITORS

All Recipients are required to comply with competition laws, ensuring that any agreement or conduct undertaken in the name and/or on behalf of the Company does not constitute an unlawful restriction of competition.

For the proper development of business competition, the Company undertakes (i) not to exploit any dominant positions and (ii) to monitor the quality of the products supplied to customers.

All Recipients of the Code of Ethics and the Model are also **prohibited** from:

- improperly damaging the image of competing companies and their products;
- violating the principles of free competition in any way;
- defrauding or misleading customers, competitors or Public Administrations.

It is also prohibited to receive and/or request gifts or preferential treatment that cannot be attributed to normal courtesy relations.

4.5 RELATIONS WITH COMPANY BODIES

Employees and collaborators of the Company, including Directors, are required to:

- ensure the utmost cooperation, transparency and truthfulness in relations they may be called upon to maintain with the Company's shareholders in connection with the control activities carried out by them;
- refrain from any conduct, whether by omission or commission, that may amount to a denial to shareholders intended to hinder their checks or divert their attention.

4.6 RELATIONS WITH THE MEDIA

Transparency in the Company's conduct must characterise any relationship with the media. External communications through the press and the mass media are coordinated and conveyed through the Company's competent organisational functions.

Information disclosed externally must always be truthful and transparent. The Company communicates through the media accurately and without discrimination. The management of communications media is reserved exclusively to the corporate functions and persons specifically appointed for that purpose.

4.7 ACCOUNTING PRINCIPLES

4.7.1 Accounting records and tax management

The Company's accounting is strictly based on the general principles of truthfulness, accuracy, completeness, clarity and transparency of recorded data.

Management events must be represented correctly, completely and promptly in the accounting records and corporate databases.

Each accounting transaction must be lawful, authorised, consistent, appropriate, recorded, traceable and adequately documented, in formal and substantive compliance with the legislation and procedures in force from time to time, so as to allow its full reconstruction at any time.

To this end, each Recipient who carries out operations and/or transactions involving sums of money, assets or other economically assessable benefits belonging to the Company must act on specific authorisation and, upon request, provide any evidence required for verification at any time.

Each tax return must be based on truthful accounting records representing lawful, existing and correctly recorded transactions. Taxes due must be paid with the utmost punctuality.

The Company ensures compliance with the principles of conduct aimed at guaranteeing: (i) the integrity of the share capital; (ii) the protection of creditors and third parties who establish relationships with it; (iii) the regular functioning of the market; (iv) the exercise of the functions of public supervisory authorities; and, more generally, (v) the transparency and fairness of the activities carried out, both from an economic and financial standpoint.

In particular, Recipients are expressly required to:

i. act correctly, transparently and cooperatively, in compliance with legal provisions, in all activities aimed at preparing the financial statements, interim balance sheets and accounting statements, and corporate communications in general, in order to provide the recipients of such communications (shareholders, creditors and third parties in general) with truthful and accurate information on the Company's economic, equity and financial position. More specifically, in this context, it is **absolutely prohibited** to prepare, draft, transmit and/or communicate, in any manner or form, inaccurate, erroneous, incomplete, deficient and/or false data and information concerning the Company's equity, economic and financial position, or to omit anything in the preparation, drafting, transmission and/or communication of such data and/or information;
ii. observe with the utmost diligence and rigour all statutory provisions designed to protect the integrity and preservation of the share capital, so as not to prejudice in any way the

legitimate reliance placed by creditors and third parties in general. In this context, it is **absolutely prohibited** to:

a) except in cases of share capital reduction provided for by law, return contributions made in any capacity by shareholders or release them, expressly or tacitly, from the obligation to make such contributions;
b) distribute profits or advances on profits that do not exist, or distribute amounts allocated by law to non-distributable reserves under the applicable provisions;
c) except in cases permitted by law, acquire or subscribe for own shares or shares of the parent company, thereby damaging the integrity of the share capital or of reserves that cannot be distributed by law;
d) carry out reductions of share capital, mergers with another company or demergers for the purpose of causing damage to corporate creditors;
e) fictitiously increase the share capital in any manner or form;

iii. ensure the proper functioning of the corporate bodies and, more generally, of the Company, allowing the Board of Statutory Auditors to carry out its activities. In this context, it is **absolutely prohibited** to conceal, in any manner or form, documents or engage in conduct that prevents the Board of Statutory Auditors from carrying out the activities falling within its competence, including accounting control.

The Company's Board of Statutory Auditors and the other persons responsible for controls have free access to the data, documentation and information useful for carrying out their respective activities.

4.8 ANTI-MONEY LAUNDERING

The Company carries out its activities in full formal and substantive compliance with the anti-money laundering legislation in force and with the applicable provisions on organised crime, and to this end undertakes to refuse to carry out transactions that are suspicious from the standpoint of fairness and transparency.

Recipients are therefore required to:

- verify in advance the available information on commercial counterparties, suppliers, *partners* and consultants, in order to ascertain their respectability, good standing and the legitimacy of their activities before entering into business relationships with them;
- operate in such a way as to avoid any involvement in transactions that are capable, even potentially, of facilitating the laundering of money deriving from unlawful or criminal activities.

4.9 CONTRIBUTIONS, FINANCING AND OTHER GRANTS IN FAVOUR OF MA SOLAR ITALY S.R.L.

Without prejudice to and recalling the principles of conduct set out in Article 3(a), the Company **strictly prohibits** its employees and collaborators from:

- using or submitting false statements and documents, or documents attesting to untrue matters, situations or facts, or omitting them, in order to obtain, to the advantage or in the interest of the Company, contributions, financing or other grants awarded by the State, a Public Body, the European Union or other bodies appointed by them;
- intentionally misleading persons belonging to the granting body through devices aimed at improperly obtaining contributions, financing or other grants for the Company;
- using contributions, financing or other grants awarded to the Company for purposes other than those for which they were assigned.

4.10 DONATIONS

The Company may accept requests for charitable contributions (e.g. donations) only in relation to proposals submitted by non-profit entities, associations and organisations, or proposals of cultural, charitable, scientific or artistic value.

Activities eligible for contributions may concern social, scientific, environmental, safety, health, sports, entertainment and artistic matters.

In any case, when selecting the proposals to support, particular attention must be paid to any possible emergence of conflicts of interest, and every financial and economic transaction carried out for this purpose must be fully traceable.

4.11 SPONSORSHIPS

The Company may sponsor events exclusively for the purpose of promoting its image, services and/or brands.

Sponsorships are remunerated in the form of money or other transparent, predetermined and economically quantifiable forms of support associated with an event, activity or initiative in which the Company’s image or brands are promoted.

4.12 GIFTS, HOSPITALITY AND OTHER BENEFITS

The Company relies on the quality of its services for the development of its business.

The Company prohibits the offering or receipt of gifts, hospitality and related expenses whenever they may influence, or be perceived as influencing, the outcome of business transactions, or are otherwise not reasonable or made in good faith.

Accordingly, the Company provides that gifts of modest value may be given as part of its ordinary business activities **only if**:

1. the gift does not involve the transfer of money or cash equivalents (e.g. gift cards, prepaid store cards, fuel vouchers, etc.);
2. the gift is permitted both by applicable law and by the recipient’s employer’s *policies*;
3. the gift is given openly and with full transparency;
4. the gift is properly recorded in the Company’s accounting and corporate books;

5. the gift is granted as a token of esteem or courtesy, or in return for hospitality, and is consistent with local customs and practices.

The Company permits meals, event admissions or other similar expenses to be offered to third parties **only if** such expenses:

1. relate to the promotion of the products marketed by the Company, or to the signing or performance of a contract with a customer;
2. are permitted under local legislation;
3. are customary under local business practices;
4. are reasonable in the circumstances and are not excessive or disproportionate;
5. do not create an appearance of impropriety.

Reasonable and bona fide travel expenses paid on behalf of customers may be permitted in certain circumstances, subject to appropriate approval. Cash payments of per diems, expenses unrelated to legitimate professional activities, and expenses benefiting a customer's friends or family members are prohibited.

4.13 CONFLICT OF INTEREST

Each employee and collaborator has a duty to perform their work exclusively in the interest of the Company, avoiding any situation of conflict, whether their own or involving family members and/or third parties in general, that may cause prejudice, even potential prejudice, to the Company. Without prejudice, therefore, to any additional obligations provided for by law and by company procedures, in general it is necessary to prevent all situations in which a conflict of interest may arise, meaning any particular situation that may interfere with the ability to make company decisions transparently and freely, while fulfilling delegated functions and assigned responsibilities exclusively in the interest of the Company, and ensuring compliance with the principles and contents of this Code of Ethics.

At all times, if the Company's employees and collaborators find themselves in situations that may interfere with their ability to make decisions independently and exclusively in the interest of the Company, they must promptly report the potential conflict of interest to their line manager.

4.14 ENVIRONMENTAL PROTECTION, PREVENTION FOR THE PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE, AND COMMITMENT TO SUSTAINABILITY

The Company considers the protection of workers' health and safety to be of primary importance, setting itself the objective not only of complying with the requirements of the specific regulations in this area, but also of continuously improving working conditions. For this reason, the Company complies with the provisions of applicable laws and regulations on protection and prevention in the field of health and safety in the workplace, as well as environmental protection, and also undertakes to make available the resources necessary to implement adequate systems, in accordance with applicable regulations, aimed at developing a high level of awareness of these aspects and promoting such awareness among all its employees and collaborators.

Suppliers (e.g. those used for maintenance activities), external collaborators, contractors and any subcontractors used for production activities and customer technical support must also be encouraged to adopt conduct consistent with principles of environmental prevention, safety, health, sustainability and corporate social responsibility.

Indeed, the Company requires Recipients to strictly observe and ensure compliance, including by their own employees and collaborators where consultants, suppliers, contractors and external collaborators of the Company are concerned, with all legal provisions protecting occupational health and safety and workplace hygiene, always acting in compliance with the procedures based on such provisions.

In managing its business activities, the Company gives the utmost consideration to environmental protection, pursuing the improvement of environmental conditions in the community in which it operates and promoting a sustainable approach to business activity, in full compliance with applicable legislation. In particular, the Company undertakes to implement measures aimed at raising awareness of and respect for the environment among all Recipients, who in turn are required to comply with environmental legislation and the applicable internal procedures in this area, as well as the authorisations and requirements issued by the competent authorities. In addition, the Company promotes actions aimed at the proper disposal of waste, paying particular attention to the selection of service providers involved in waste management.

4.15 PRIVACY PROTECTION AND MANAGEMENT OF CONFIDENTIAL INFORMATION

The Company, in full compliance with the legislative provisions governing privacy in the countries in which it operates, is committed to protecting the personal data acquired, stored and processed in the course of its business activities.

All employees and collaborators of the Company are required to maintain the utmost confidentiality with regard to information, documents, studies, initiatives, projects, contracts, plans, etc., of which they become aware as a result of the services performed, with particular reference to those that may compromise the image or interests of customers and of the Company.

The Company implements appropriate measures to protect the information it manages and to prevent such information from being accessible to unauthorised personnel. All information, particularly information obtained in the course of activities carried out for customers, must be considered confidential and may not be disclosed to third parties or used to obtain personal advantages, whether direct or indirect.

4.16 USE OF COMPANY ASSETS AND IT SYSTEMS

Each employee and collaborator is required to safeguard the Company’s assets through responsible conduct and in accordance with company provisions, diligently protecting the movable and immovable assets, technological resources and IT media, equipment, information and *know-how* owned by the Company.

With specific reference to IT applications, each employee and collaborator of the Company is required to use the *hardware* and *software* equipment made available to them exclusively for purposes connected with the performance of their work duties.

In particular, each employee and collaborator is required to:

- use IT resources (*software* and *hardware*), email, company assets and equipment exclusively for institutional activities, acting responsibly and in compliance with internal provisions, thereby avoiding any use for personal purposes;
- refrain from using, duplicating, reproducing, transmitting, publishing, importing, distributing, selling, marketing, leasing or otherwise using programs, applications, logos, images or other video, audio, IT or other materials without a licence or authorisation, or in any case in breach of copyright or industrial property protection legislation;
- refrain from preparing means to remove or circumvent protection devices for computer programs;
- refrain from manufacturing or industrially using goods or processes created by misappropriating or infringing third-party industrial property rights;
- scrupulously adopt the procedures and rules set out in the policies on the use of email;
- not browse websites characterised by indecorous and offensive content.

It is prohibited to use the Company's IT and telecommunication tools and services for unlawful purposes or for purposes not permitted and authorised by the Company. In particular, the Company **expressly prohibits** any conduct involving the alteration of the operation of IT or telecommunication systems and/or the manipulation of the data contained therein that may cause damage to others, as well as any conduct aimed at unlawfully accessing or remaining within another party's IT or telecommunication system, or in any case against the owner's will.

4.17 QUALITY AND SAFETY OF PRODUCTS AND SERVICES

The Company undertakes to ensure adequate quality and safety standards for the products and services offered, monitoring their quality and full compliance with those standards, also with a view to ensuring customer satisfaction, in line with the reputation that has always distinguished the Company's operations.

Recipients are prohibited from being involved, in any capacity, in the sale of products whose characteristics (in terms of quality, quantity, composition and safety) differ from those declared or agreed, or which bear names, trademarks or distinctive signs capable of misleading the end consumer as to the quality, origin and provenance of the products offered.

When advertising products under its own brand, the Company requires the relevant persons always to verify in advance that the information provided complies with applicable legislation and accurately reflects the composition of the materials and products in terms of qualitative, quantitative and safety characteristics. In addition, the Company requires the relevant persons to carry out appropriate checks on the quality and professionalism of suppliers that contribute to the manufacture of the product itself and/or to which contracted services are entrusted.

4.18 MARKETING OF PRODUCTS AND PROTECTION OF INTELLECTUAL AND INDUSTRIAL PROPERTY

The Company operates in full compliance with intellectual and industrial property rights lawfully held by third parties, as well as with the laws, regulations and conventions protecting such rights.

In carrying out their activities, Recipients must refrain from any conduct that may constitute the misappropriation of industrial property rights, the alteration or counterfeiting of trademarks and/or distinctive signs of industrial products, or of patents, designs or industrial models, whether national or foreign, and must also refrain from importing, marketing or otherwise using or putting into circulation industrial products bearing counterfeit, altered or misleading trademarks and/or distinctive signs, or products made by misappropriating industrial property rights.

5. METHODS OF IMPLEMENTING THE CODE

5.1 DISCLOSURE OF THE CODE, INFORMATION AND TRAINING

This Code of Ethics is brought to the attention of the Recipients in the most effective and widespread manner possible, by the competent corporate functions.

This Code is disseminated as widely as possible through dedicated communication activities addressed to all internal and external parties, including future employees and collaborators, who work for the Company.

Information to members of the corporate bodies, employees and collaborators regarding the content of the Code of Ethics is ensured through: (i) delivery or, in any event, making available of the Code of Ethics at the time of hiring/appointment, including by electronic means; (ii) information *emails*, also for the purpose of periodically sending updates to the Code of Ethics; and (iii) publication on the Company's institutional website.

Responsibility for disseminating the Code of Ethics and its updates lies with the Company's HR Office. In particular, that function sends the documentation to the Recipients by *email* and receives, through the same channel, the related acknowledgement of receipt from each Recipient.

All members of the corporate bodies (directors and statutory auditors) and employees are required to complete a declaration whereby, having acknowledged the content of the Code of Ethics, they undertake to comply with the provisions contained therein.

Communication of the Code of Ethics is also addressed to those external parties that have contractual relationships with the Company. To this end, when signing the relevant contract, the Function that requested the service from the external party shall provide that party with a copy of the Code of Ethics and refer to its contents in the contract through appropriate clauses, which shall also provide for the right to terminate the contract in the event of breach.

In order to give effective implementation to the principles set out in the Code of Ethics, the Company prepares a training plan for the members of the corporate bodies, employees and collaborators who work directly within the Company's structure, covering, among other things, the principles contained in the Code of Ethics.

5.2 REPORTS

Any representative of the Company, employee, collaborator, consultant or agent, etc., who becomes aware of alleged breaches of this Code of Ethics or of conduct that does not comply with the rules of conduct adopted by the Company is encouraged to report it immediately through the whistleblowing reporting channels made available by the Company, as further described in the Whistleblowing Reports Management Procedure adopted by the Company, available on the company *intranet* and fully referred to herein. Anyone who reports a breach in good faith shall be protected against any form of threat, retaliation or discrimination. Any report made in bad faith shall be treated as a disciplinary offence.

*

6. BREACHES AND SANCTIONS

The obligation to comply with and observe the rules contained in this Code of Ethics shall be considered an essential and integral part of the contractual obligations applicable to the Company's employees, as well as to external collaborators and consultants.

Consistently with its rigorous approach in this area, the Company shall treat any breach as a disciplinary offence in relation to employees and as a contractual breach in relation to collaborators and other third parties.

Any breach by the Recipients of the provisions contained in this Code of Ethics shall entail the application of the sanctions provided for in Chapter 9 of the General Part of the Model adopted by the Company, of which this Code forms an integral part.

24/06/2026