CODE OF ETHICS 2025

AGLA POWER TRANSMISSION
Italy

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CODE OF ETHICS

AGLA
Innovation
Passion
Determination

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Guiding principles

Sustainability Policies
These extend and supplement the Code of Ethics adopted by the Company. The Guiding Principles are the cornerstone, further detailed in four dedicated policies: Health and Safety, Environment and Resources, Rights and Society, Quality and Responsibility.

UN Global Compact
Promotes the creation of a more inclusive and sustainable global economy by committing members to share, support and apply the Ten Principles on human rights, labour standards, environmental protection and anti-corruption in their sphere of influence, and to support the United Nations goals, including the *Sustainable Development Goals*

Sustainable Development Goals
On 25 September 2015, the United Nations General Assembly adopted the 2030 Agenda for Sustainable Development, which is divided into 17 goals - the *Sustainable Development Goals* (SDGs) - and 169 sub-goals (*targets*). The SDGs and related targets identify global priorities for 2030, also valid for business, and define an integrated action plan for people, the planet, prosperity and peace

This Code of Ethics defines the set of fundamental principles and rules of conduct to which Agla Power Transmission adheres. These principles and rules, with the further guidance provided by the Sustainability Policies adopted and periodically updated, guide the sustainable success of the Company, contributing to the creation of shared value in the long term.

The Company's activities are inspired by values consistent with the most advanced international practices in terms of governance, including the United Nations Global Compact, the largest strategic corporate *responsibility initiative*. The Company supports and is inspired by the Ten Principles and Sustainable Development Goals as well as the broader goals of the United Nations.

To this end, the Company fully embraces a sustainable strategy through policies, management, operating methods and initiatives tailored to its specific characteristics, helping to promote a healthy, inclusive and sustainable global economy, respectful of human and labour rights, capable of safeguarding the environment and actively involved in the integrity of every aspect of the business.

Compliance with the principles and provisions of the Code of Ethics is the fundamental conduct that binds directors, employees, collaborators and all those who work in any capacity with the Company in all internal and external relations with the Company.

In particular, the Management is required to be inspired by the principles of the Code in setting objectives, proposing investments and implementing projects, as well as in any decision or action relating to the activities managed; likewise, the managers, in giving concrete implementation to their management activities, must be inspired by the same principles, both internally, thus strengthening cohesion and the spirit of mutual collaboration, and towards third parties who come into contact with the Company.

Vision, Mission and Values

Agla Power Transmission manufactures and offers to the market a wide range of products of proven quality. AGLA POWER TRANSMISSION opened its doors as a company specializing in sheet metal stamping and component assembly. Today AGLA POWER TRANSMISSION is a global leader in the cold plastic deformation of steel, an expertise that translates into innovative technological solutions dedicated to components for engines and automatic transmissions.

VISION

Innovation is the trademark of a leader: this is why at AGLA POWER TRANSMISSION innovation is not a goal, but our very raison d'être. Innovation is also widespread, i.e. it does not concern a specific company department, but every aspect of our work, involving all staff in the continuous improvement of product, process and company organization.

MISSION

No competition can be won without passion, the authentic engine of those who work in AGLA POWER TRANSMISSION. Every company goal is born from the creativity and motivation of our people, the true protagonists of the company's results.

VALUES

Innovation

Passion

Determination

Scope

The Recipients of the Code of Ethics, except as expressly established in the individual sections of this document, are Personnel, Company Collaborators, Third Parties.

The Code of Ethics is a set of principles and rules to which Personnel must comply, also in accordance with the provisions of the National Collective Labour Agreements on rules of conduct and disciplinary sanctions. Compliance with the provisions of the Code of Ethics is required in the context of employment contracts of any type and nature, including those concerning managers, project staff, part-time staff and collaboration contracts falling within the scope of para-subordination.

The application of the Code of Ethics to Collaborators and Third Parties is subject to the signing of declarations and/or the inclusion in the contracts, mandates, assignments or partnership agreements that bind them to the Company of specific clauses that commit the subject to compliance with the Code of Ethics and that formalize the sanctions for violations of this commitment.

Personnel Employment contracts of any type and nature, including those concerning managers, project staff, part-time staff, temporary workers, internships and collaboration contracts falling within the para-subordination.

Collaborators Those who, by virtue of a contract or mandate, act in the name and on behalf of the Company (consultants, intermediaries, special attorneys).

Third Parties Those who have business relationships with the Company, such as suppliers, customers, partners, investors, and the beneficiaries of social initiatives, donations and sponsorships.

Protection and enhancement of people

INCLUSIVE WORK ENVIRONMENT

The Company believes in people as a fundamental element for business success. For this reason, it promotes in all its activities a work environment free from any form of discrimination or prevarication, in which respect, collaboration and mutual support can fully develop the potential of human capital. In particular, the Company:

- rejects all forms of forced and child labour;
- rejects any behaviour that constitutes physical or psychological violence, coercion, harassment, bullying or behaviour in any way attributable to mobbing and harassment practices;
- rejects any type of sexual harassment however carried out and, regardless of legal definitions, considers any attitude or behavior that may create discomfort or fear in the other person unacceptable and prohibited;
- establishes working relationships characterized by fairness, equality, non-discrimination, attention and respect for the dignity of the person;
- promotes equal opportunities, particularly between genders, for every employee or candidate;
- respects workers' rights and trade union freedoms, such as freedom of association and collective bargaining in particular, including through responsible and constructive dialogue with labour protection organisations that fosters a climate of mutual respect in line with the principles of fairness, transparency and participation;
- adopts selection and evaluation processes based on criteria of merit, competence and possible and achievable objectives;
- recognises fair treatment in relation to the role, commitment and results achieved and promotes a correct redistribution of the value created.

Relations with Personnel are primarily based on the values of fairness, loyalty, transparency and mutual respect and regulated, from a contractual point of view, in compliance with the regulatory provisions in force in the various countries on the subject of employment.

The values expressed in the Code of Ethics represent the rules of conduct on which professional and personal relationships within the company are based. Under no circumstances is it permitted to pursue or achieve private or corporate interests in violation of the law, regulations, sector legislation, internal procedures and the control system.

All the Company's people contribute in a concrete way to the achievement of the company's objectives, in compliance with the values and rules of conduct dictated by the Code of Ethics. Relations between the different levels of responsibility must be carried out with loyalty and fairness.

UN Global Compact

Principle I: Companies are required to promote and respect universally recognized human rights within their respective spheres of influence.

Principle II: Companies are required to ensure that they are not, even indirectly, complicit in human rights abuses.

These principles derive from the Universal Declaration of Human Rights, which is the minimum international standard for the protection of individual rights and freedoms. These fundamental provisions are now regarded as the basis of international law. The principles of equality, life and safety, personal, economic, social and cultural freedom are considered customary international law, i.e. directly recognized as legal norms.

Principle III: Companies are required to support workers' freedom of association and recognize the right to collective bargaining

Principle IV: Enterprises are required to support the elimination of all forms of forced and compulsory labour

Principle V: Enterprises are required to support the effective elimination of child labour

Principle VI: Enterprises are required to support the elimination of all forms of discrimination in employment and occupation

These principles were derived from the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, which calls on all ILO member states to apply its principles, in line with the conventions on which it is based. It is a shared approach that all countries, regardless of their degree of economic development, cultural values and the number of ILO Conventions ratified, respect, promote and implement these fundamental principles and rights.

DIVERSITY AND CULTURE OF PLURALITY

The Company, in the context of its own organization, promotes and supports working conditions and interpersonal relationships that favor the integration and enhancement of different cultures and lifestyles, starting from respect for the characteristics of sex, sexual orientation, age, nationality, state of health, political opinions, race, religious beliefs and any other diversity.

The Company considers plurality and diversity as sources of enrichment and resources for the development of humanity, respects and values the exclusive contribution of each individual to the company's activities, creating an inclusive work environment that respects the dignity of everyone, taking into account the contribution of each and recognizing the strength of differences.

The Company requires all Recipients to behave in a way that conveys and reinforces the values of diversity, avoiding and censuring any form of discrimination. In addition, it supports organizational models that enhance cooperation between people from different cultures, perspectives and experiences and adopts training, communication, behavioral and operational measures that contribute to the evolution of internal culture towards extensive models of active inclusion of all diversities.

In particular, in support of the specific commitment to gender equality, considered an essential element for professional growth, the Company supports the Women Empowerment Principles in all activities.

Women Empowerment Principles (WEP)
Promoted by UN Women and the United Nations Global Compact, they commit the signatories to thegender equality and women's empowerment in the workplace, in the economy andin communities.

1. Establish a high-level corporate culture and managerial leadership that aims at parity between men and women.

2. Equal treatment of men and women in the world of work – maintenance and promotion of human rights and non-human rights discrimination.

3. To guarantee the health, safety and psychophysical well-being of all workers during their activity.

4. To promote personal and vocational training and to support women in the field of career.

5. Promotion of entrepreneurial activities by women, recognition of their role in HR and respect for their dignity in all kinds of marketing.

6. Promoting equality through shared initiatives and advocacy.

7. Measurement and publication of all progress made in equal treatment of men and women at work.

PROFESSIONALISM AND CONTINUOUS TRAINING

The Company considers the complex of relational, intellectual, organizational and technical skills of each person to be considered a strategic resource, to be protected and enhanced so that individual aptitudes find realization and recognition, also through appropriate professional updating courses. It therefore promotes the development of a culture based on the dissemination of knowledge, which values the behaviour and contributions of everyone.

The Company believes in continuous training as a tool for the enrichment of people, the dissemination of ethical values, organizational integration and the promotion of change and innovation.

HEALTH, SAFETY AND WELL-BEING

The Company promotes a healthy and safe working environment. In addition, well beyond legislative compliance, it supports in all activities the development of a culture of health and safety built on managerial leadership and a solid management system, in order to guarantee and protect the psycho-physical integrity of the members of the Personnel and of all the people who work, access or stay in the spaces and facilities of the Company.

A similar approach is dedicated to building and maintaining inclusive and motivating work environments, aimed at people's well-being.

All Recipients are required to ensure full compliance with the law, internal procedures and any other provision provided for to prevent risks to their own safety and that of others and to guarantee the protection of health and hygiene in the workplace.

Responsible Stakeholder Relations

INVESTORS

The Company is keen to establish a constant dialogue with investors and, in general, with the market, in order to provide systematic dissemination of exhaustive and timely information on its activities, with the only limit being the confidentiality requirements that certain information may present.

In compliance with the Vision, Mission and Values, which inspire the strategies and the flow of investments and divestments, the Company guarantees:

- transparent, clear, accurate and complete communication of information relating to the company's development and performance;
- equality of information with all investors, without discrimination or preferential behaviour. The information is made available through a variety of channels, including the institutional website.

The Corporate Governance system adopted, in addition to being an essential tool for the sustainable success of the Company, contributing to the creation of shared value in the long term, ensures effective management, the creation of value for shareholders, the control of business risks and transparency towards the market.

PUBLIC ADMINISTRATION AND INSTITUTIONS

As part of its activities, the Company intends to promote a constructive and transparent dialogue with the Institutions and the Public Administration, also in order to promote greater mutual knowledge in the context of the dialogue between the public and private sectors functional to the development of business culture.

It is forbidden to give, offer or promise, even indirectly, money, goods, services, benefits or favors that are not due (including in terms of employment opportunities) to public officials and public service officers to influence their decisions in relation to relationships from which the Company can derive any advantage.

It is also forbidden to establish personal relationships with the Public Administration solely aimed at exercising improper influence and undue interference in decisions that see the Company as a counterparty.

Those who, within the scope of their functions, find themselves legitimately having relations with the Public Administration and Public Institutions, are responsible for verifying in advance, and with due diligence, that what has been declared or certified, in the interest or on behalf of the Company, is truthful and correct.

JUDICIAL AUTHORITIES AND SUPERVISORY AND CONTROL AUTHORITIES

Relations with the judicial authorities and the supervisory authorities are based on maximum collaboration and transparency.

The Company undertakes to cooperate with the judicial authorities and the supervisory and control authorities, if investigations are carried out against it or against commercial partners, avoiding hindering their institutional activity in any way, active or passive.

Specifically, it is forbidden:

- exert pressure on the person called upon to make statements before the judicial authorities and the supervisory authorities, in order to induce him not to make statements or to make false statements;
- help those who have committed a criminally relevant act to evade the investigations of the Authorities, or to evade their searches.

In the context of periodic communications and reports and in specific relationships, the Company undertakes to guarantee the completeness and integrity of the information provided and the objectivity of the assessments made, carrying out the required obligations according to the deadlines provided for by law or required by the Authorities.

It is forbidden to give, offer or promise, even indirectly, to the representatives of the judicial authority and the supervisory and control authorities money, gifts, goods, services, benefits or favors (including in terms of employment opportunities) to obtain treatment or a favorable outcome not due on the occasion of verifications, inspections or access to documents.

POLITICAL AND TRADE UNION ORGANIZATIONS

Personnel participate in political organizations outside working hours and without any connection with the function performed at the Company.

The Company recognises and promotes the right to participate in trade union activities in compliance with current legislation and collective labour agreements.

The Company refrains from any direct or indirect pressure on politicians in order to obtain undue advantages. Any direct or indirect contributions, in cash, in kind, or in any other form to political parties, movements, committees and other political and trade union organizations is disbursed within the limits and in compliance with the transparency required by law and recorded in accordance with internal accounting procedures.

MEDIUM

The Company recognizes and appreciates the informative role played by the media and analysts in terms of financial education and communication to the public.

These are objectives to which the Company intends to contribute, collaborating fully with the media, in compliance with their respective roles.

The Company's communications to the media must be truthful, clear, transparent, in line with the ICC Principles on Publicity and Communication and must be consistent, accurate and in accordance with company policies and programs, with the only limitation of the confidentiality requirements that certain information may present.

An employee or collaborator invited, in the name or on behalf of the Company, to speak at conferences, congresses or seminars, or to write articles aimed at the public, expresses content and positions in line with those of the Company itself.

Promotion strategies and practices must respect the values expressed in the Code of Ethics. The Company takes care of the information published on the corporate website in order to make it a complete, effective tool in line with market information expectations.

GLOBAL AND LOCAL COMMUNITIES

The Company considers the relationship with the territory to be of the utmost importance. Beyond the creation of shared value through investment activities, it supports the initiatives of associations, foundations and non-profit organizations on the issues of culture, social, environment, health, sport, entertainment and art.

Financial support is intended only for events or entities that offer guarantees of seriousness and for which activities aimed at jeopardizing compliance with the values and principles of conduct expressed by the Code of Ethics can be excluded.

SUPPLIERS

Suppliers are made aware of the need to carry out their activities by following standards of conduct consistent with those indicated in the Code of Ethics. The Company, in order to protect its operational effectiveness and to safeguard its resources, including image and reputation, does not have relations with parties who do not intend or who have demonstrated that they do not operate in compliance with current legislation and according to the values expressed in the Code of Ethics.

Suppliers are selected through transparent and objective assessments of professionalism and business structure, taking into account quality, price and methods of supply of goods or performance of services.

Suppliers are selected by also assessing their ability to meet the confidentiality obligations that the nature of the service offered imposes.

It is forbidden for the Recipients to offer, promise or give money, goods, utilities or any other benefit (whether direct or indirect) that is not adequately justified in the context of the contractual relationship with the Supplier or that is in any case aimed at obtaining preferential treatment for the Company.

It is also forbidden to accept the promise or the giving of money, goods or other benefits by the Supplier to carry out acts in violation of the duty of loyalty or the obligations inherent in its office or with the sole purpose of favoring the Supplier with the Company.

Supplier Code of Conduct
The Company promotes in all activities the adoption of a Supplier Code of Conduct which, in addition to current legislation, takes into account the values expressed in the Code of Ethics, the guidelines provided by the Sustainability Policies and in general all the aspects necessary for the *responsible sourcing process*, such as human and labour rights, health and safety, environment, animal welfare, safety and quality of products and services, *business integrity* and protection of privacy and intellectual property.

CUSTOMERS AND CONSUMERS

The Company promotes commercial policies and strategic choices in all activities aligned with *best practices* and the principle of professional loyalty to customers and consumers.

Commercial initiatives, aimed at promoting the company and encouraging the purchase of products or services, must be carried out in compliance with the legislation that protects the interests of consumers and customer satisfaction. In addition, customers and consumers must be able to have complete, up-to-date, verified and transparent information on the characteristics and quality of products and services, including, where necessary, aspects related to environmental and social performance. This is in order not only to allow free and informed choices, but also to promote responsible lifestyles and consumption.

COMPETITORS

The Company believes in the value of free and fair competition as a fundamental tool for the development and definition of the best offer in all the fields in which it operates. To this end, it operates with the utmost transparency in compliance with current antitrust rules and in full respect of its competitors.

In the case of contacts with third-party or competing companies, the Recipients must refrain from providing information, news or confidential data that may generate initiatives or conduct contrary to the rules and laws relating to the protection of the market and competition.

REPRESENTATIVE ORGANIZATIONS

The Company considers active participation in sectoral, professional, mandatory or voluntary representative organizations, governmental or non-governmental, an opportunity to promote, disseminate and consolidate its ethical practices.

The Recipients, who represent the Company in these contexts, are called upon to behave, express positions and any other active contribution in line with the principles and rules expressed in the Code of Ethics and related documents such as the Sustainability Policies.

Commitment to the environment

ENVIRONMENTAL PROTECTION

The Company undertakes to comply with current legislation on environmental protection and protection and to prevent, minimize, mitigate and offset the footprint generated by its activities on the environment and living species. In addition, La Società recognizes the need for a proactive transition to a regenerative economy, respectful of the sentient nature of animals and low carbon, capable of creating social value.

The Company promotes environmental policies and actions in all its activities, declining them according to sectoral specificities, aimed at:

- adopt measures aimed at minimizing, mitigating and balancing the environmental footprint generated by the activities;
- to give priority to the adoption of measures aimed at preventing any damage to the environment through risk prevention programmes and continuous improvement of the technologies used and management and control practices, even beyond the requirements and parameters dictated by the legislation in force;
- promote the responsible use of natural resources and the reduction of consumption;
- ensure transparency towards stakeholders and, in particular, towards the community and the territory in which the industrial activity is carried out.
- promote the adoption of international best practices in terms of industrial processes, the highest standards of quality, safety, environmental protection and process and product innovation policies towards sustainable solutions compatible with responsible lifestyles and consumption.
- actively contribute to global challenges, such as climate change, the conservation of biodiversity and the preservation of non-renewable resources.

UN Global Compact

Principle VII: Businesses are required to support a preventive approach to environmental challenges

Principle VIII: Businesses are required to take initiatives that promote greater environmental responsibility

Principle IX: Businesses are required to encourage the development and deployment of environmentally friendly technologies

The three principles on environmental protection expressed by the Global Compact were taken from the United Nations Declaration of Principles and International Plan of Action on Sustainable Development (Agenda 21) defined by the United Nations Conference on Environment and Development, which met in Rio de Janeiro from 3 to 14 June 1992. Chapter 30 of Agenda 21 expresses the concept that trade and the business community should play a fundamental role in safeguarding natural resources and the environment. In particular, companies can contribute with the use of cleaner production and more responsible business management.

Integrity and compliance

LAWS AND REGULATIONS

UN Global Compact

Principle X: Companies commit to fighting corruption in all its forms, including extortion and bribery

The fight against corruption is one of the world's main challenges. Corruption is in fact a major obstacle to sustainable development and democracy and has a devastating effect especially on the poorest communities. The impact of corruption on the private sector is also considerable, impeding economic growth, distorting competition between companies and presenting serious legal and reputational risks for companies.

The international fight against corruption has recently gained momentum following the adoption by the Organisation for Economic Co-operation for Development (OECD) of the OECD Convention on Combating Bribery of Foreign Public Officials in International Transactions and following the entry into force in December 2005 of the first international instrument adopted worldwide: the United Nations Convention against Corruption (UNCAC).

The Company adopts compliance with the principle of legality and the legislation in force in Italy and in the international contexts in which it operates, including the applicable technical standards, as an essential value of its work.

To this end, the Company undertakes to ensure that everyone is aware of the requirements deriving from the laws in force in the national or international contexts in which it operates and from the internal governance rules adopted. Everyone, in relation to their function, mandate or type of relationship with the Company, must know their responsibilities and understand the conduct to be adopted.

FIGHT AGAINST CORRUPTION

The Company excludes and condemns any phenomenon of corruption, bribery, undue inducement and influence peddling, both in the public and private sectors, and adopts prevention and control measures aimed at avoiding the commission of such crimes in the performance of its activities. The Company is committed to preventing the use or distribution of counterfeit or unauthorized parts in its products and supply chain. To this end, adequate controls are adopted in the processes of selecting suppliers, procurement and verifying the quality of the materials and components used. All materials must be sourced from qualified and approved suppliers. Any suspicions relating to the presence of counterfeit parts must be immediately reported and verified.

COMBATING THE PHENOMENON OF MONEY LAUNDERING

The Company operates in accordance with the principle of maximum transparency in commercial and financial transactions and prepares the most appropriate tools in order to combat the phenomenon of money laundering and reuse of illicit proceeds, at national and transnational level.

FIGHT AGAINST CRIMINAL ORGANIZATIONS

The Company condemns all forms of criminal organizations of a national and transnational nature and adopts suitable measures to prevent the danger of its involvement in relations and activities maintained for any reason and in any way, including in the form of mere assistance and help, with such organizations.

Therefore, the Company does not establish any employment, collaboration or investment relationship with subjects, whether natural or legal persons, whose involvement in acts of terrorism or criminal organizations is known or suspected, just as they do not finance or facilitate any activity referable to such organizations.

CONFLICT OF INTEREST

The Company's activities are conducted for the benefit of all its Stakeholders on the basis of principles of integrity, fairness, loyalty and transparency. Under no circumstances can partisan interests prevail to the detriment of a global and shared interest.

In the event that a conflict of interest arises, the Company undertakes to manage the situation in compliance with the law, internal *governance* and the principle of transparency.

The Management maintains a behavior inspired by autonomy and independence with Public Institutions, economic and political institutions, as well as with any other natural or legal person. The Corporate Bodies are required, in particular:

- to assess and communicate to the management and control bodies situations of conflict of interest, including potential, or incompatibility of functions, positions or positions outside and within the Company;
- to refrain from carrying out acts that may cause damage to the Company and from participating in the approval of the resolutions of the body to which they belong relating to matters that present profiles, even potential, of conflict of interest;
- to avoid using confidential information of which they are aware by reason of their position or position to obtain personal advantages, direct or indirect, or to obtain it for third parties.

The Company's Personnel, undertaking to comply with the constraints of transparency and loyalty in their activities, may not:

- take on employment for third parties, as well as take on consultancy assignments or other responsibilities on behalf of third parties without the prior authorization of the Company;
- take a decision-making or operational role in business activities if it can be influenced by personal interests that are such as to hinder the taking of impartial decisions;
- personally take advantage of business opportunities of which he has become aware in the performance of his duties.

PRIVACY

The Company undertakes to process personal data and confidential information that may be collected in the course of carrying out its business in compliance with the relevant laws and applicable best practices.

Therefore, the Company protects the right to privacy of Individuals, customers, suppliers, business partners and all those with whom it establishes relationships, using data and information only for defined and appropriate purposes.

TRANSPARENCY, CORRECTNESS AND COMPLETENESS OF INFORMATION

The Company takes the utmost care to provide all stakeholders with accurate, timely and complete information regarding its performance.

This standard applies to financial and non-financial reporting, in accordance with consolidated and audited accounting principles, and to all public documents of the company, in order to provide a true and comprehensive representation of the facts.

EXPORT CONTROLS AND ECONOMIC SANCTIONS

The company operates in full compliance with national and international regulations regarding export controls, trade restrictions and economic sanctions. Employees, contractors and business partners must ensure that products, services, technologies and information are not exported, re-exported or transferred in violation of applicable regulations. The Company carries out appropriate checks on the

customers, suppliers and business operations in order to prevent violations of international trade regulations.

Company Resources and Assets

USE MANAGER OF ASSETS CORPORATE AND COMPUTER SYSTEMS

Each Recipient is required to work diligently to protect company assets and avoid improper use, which may cause damage, reduce efficiency or in any case be contrary to company procedures.

All persons are responsible for the protection of company assets and the use of the computer systems under their direct control.

The use of the Internet and e-mail messages from company accounts must refer only to topics consistent with the work activity.

CONFIDENTIALITY, CORPORATE INFORMATIONS AND INTELLECTUAL PROPERTY

Corporate information and documentation are one of the main elements of the Company's assets and therefore of each stakeholder and whose unauthorized dissemination can create economic and reputational damage.

Without prejudice to the provisions of the law on the subject, Personnel and collaborators are required to maintain the utmost confidentiality on documents and, in general, on all news and information learned in the context of investment projects and business operations.

Personnel and Collaborators may not use the information and documentation they access within the scope of their functions for any use that is not professional and are bound by strict compliance with professional, commercial or industrial secrecy. Information of a confidential nature may be disclosed within the company organization only to those who demonstrate that they need it for business reasons.

Any form of personal investment, direct or through an intermediary, which finds its source in confidential company news or inside information, is prohibited for all Recipients.

REPUTATION

All Recipients, and in particular the Corporate Bodies and Personnel, protect the Company's reputation, acting in compliance with the principles of the Code of Ethics and safeguarding its relational capital, considering the expectations of stakeholders.

This also involves a use of the brand that is fully consistent with the Vision, Mission and Values and actions on social networks, or in any case in the public domain, that are not likely to damage the Company's reputation, even if only potentially.

Implementation and control mechanisms

PROMOTION, DISSEMINATION AND TRAINING

The Company undertakes to ensure that all stakeholders are disseminated and aware of the Code of Ethics and related documents, at least through publication on the institutional website.

The Company undertakes to implement specific training programs for Personnel, aimed at guaranteeing and maintaining effective knowledge of the Code of Ethics over time. The training activity is mandatory for those for whom it is intended.

The Code of Ethics is also shared with counterparties during the exchange of documentation during the investment definition phases.

REPORTS

The Company adopts the measures deemed most appropriate to facilitate the timely reporting of violations of the Code of Ethics, drawing inspiration from the principles and requirements set out in Law no. 179 of 30 November 2017 on Whistleblowing.

The duty to report involves the Management, Personnel and Collaborators and concerns facts or conduct in violation of the Code of Ethics of which they are directly aware or of which they have become aware through communication from others, including Third Parties.

The report can also be anonymous. Reports must be as detailed as possible and based on factual elements.

The report must be made by e-mail, by ordinary mail. All reporting channels ensure that the confidentiality of the whistleblower's identity is protected.

The Company prohibits any act of retaliation or discrimination, direct or indirect, against the whistleblower for reasons directly or indirectly related to the report, even if the report proves to be unfounded on the merits.

The Company reserves the right to take any action against anyone who makes untruthful reports with intent or gross negligence or aimed at damaging the Company or the Personnel.

SANCTIONING SYSTEM

The Company condemns any conduct that does not comply with the provisions of the Code of Ethics, even if the conduct is carried out in the interest of the Company with the intention of bringing an advantage to the same.

Violations of the Code of Ethics are subject to the sanctioning system adopted pursuant to the Company's Organisation, Management and Control Model, which is referred to herein.


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