



BAUFLOOR
pavimenti a regola d'arte



Discover Akifix Channel



FORNITURE PER FINITURE D'INTERNI E ISOLAMENTI TERMOACUSTICI • PRODUZIONE • ELABORAZIONE • COMMERCIALIZZAZIONE • IMPORT / EXPORT FISSAGGI • ACCESSORI METALLICI • UTENSILERIA TECNICA

ADOPTION OF THE ORGANISATION, MANAGEMENT AND CONTROL MODEL

pursuant to legislative Decree No. 231/2001

Akifix S.p.A., in pursuing a business philosophy based on managing corporate activities with efficiency, fairness and loyalty throughout everyday processes, has chosen to adopt the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001, thereby adapting and integrating its organisational system to the requirements of that legislation.

The adopted Model consists of several elements: assessment of activities that are potentially at risk; principles, standards and rules of conduct; control tools; control procedures and protocols; a disciplinary system; a Supervisory Body (Organismo di Vigilanza) and related information flows.

The primary purpose of the Model is to prevent the commission of the offences envisaged by the Decree.

PAG. 1 di 1

The principles, provisions and requirements set out in the Model are binding on directors, employees, and on all those who act on behalf of and in the interests of Akifix S.p.A.

The Company also has a Code of Ethics that defines the set of values the Company recognises, accepts and shares, at all levels, in the conduct of its business.

The principles and provisions of the Code of Ethics represent specific examples of the general obligations of diligence, fairness and loyalty that govern the performance of work, conduct within the workplace and the Company's activities.

Lastly, please note that, by resolution of the Sole Director, the Company has established its own Supervisory Body, vested with autonomous powers of initiative and control, tasked with overseeing the functioning of and compliance with the Model and ensuring it is kept up to date.

Attachments:

1. Table of contents of Organisation, Management, and Control Model pursuant to Legislative Decree No. 231/2001
2. Code of Ethics

Akifix S.p.A.

Sede logistica e amministrativa: Viale Caduti sul Lavoro, 9 - 11 - 13 - 60030 Monsano - Ancona - Italy
Tel. +39 0731 61 90 25 Fax +39 0731 61 92 80

Sede logistica Nord Italia: Via dell'Adige, 5 - 39040 - Cortaccia - Bolzano - Italy
Tel. +39 0471 81 78 00

Sede legale: Corso Italia, 27 - 39100 Bolzano - Italy

C.F./P.IVA/ R.I. Bolzano 02395720424 Capitale sociale € 3.122.222,00 i.v. - Numero REA BZ-216432

Società sottoposta ad attività di direzione e coordinamento da parte di Akifix Holding S.r.l. - P.IVA/C.F. 03189170214

Website: www.akifix.com **e-mail:** info@akifix.com akifix@akifix.com





ORGANISATION, MANAGEMENT AND CONTROL MODEL

MODEL TABLE OF CONTENTS

GENERAL SECTION

SPECIAL SECTION

ANNEX 1 – RISK ASSESSMENT E GAP ANALYSIS

ANNEX 2 – CODE OF ETHICS

ANNEX 3 – CHARTER OF THE SUPERVISORY BODY

ANNEX 4 – DISCIPLINARY SYSTEM

ANNEX 5 – 231 INFORMATION NOTICES AND CONTRACTUAL CLAUSES

ANNEX 6 – LEGISLATIVE DECREE No. 231/2001

ANNEX 7 – CONFINDUSTRIA – GUIDELINES FOR THE CONSTRUCTION OF ORGANISATION, MANAGEMENT AND CONTROL MODELS PURSUANT TO LEGISLATIVE DECREE No. 231/2001

PROTOCOLS

- PROTOCOL 01 – Dealings with the Public Administration
- PROTOCOL 02 – Selection, recruitment and personnel management; Expense Reimbursements and Representation Expenses
- PROTOCOL 03 – Management of consultancy services and engagement of third-party professionals
- PROTOCOL 04 - Preparation Cycle for the Statutory Financial Statements and the Budget, and Management of Extraordinary Corporate Transactions
- PROTOCOL 05 - Cash and Financial Flows
- PROTOCOL 06 - Compliance with Workplace Health and Safety Obligations pursuant to Legislative Decree No. 81/2008
- PROTOCOL 07 - Environmental Offences
- PROTOCOL 08 - Computer Offences, Unlawful Data Processing and Offences Relating to Copyright Infringement
- PROTOCOL 09 - Commercial and Marketing
- PROTOCOL 10 - Procurement
- PROTOCOL 11 - Development, Production and Quality Control
- PROTOCOL 12 - Organised Crime Offences and Inducement Not to Make Statements or to Make False Statements to the Judicial Authority
- PROTOCOLLO 13 - Reports and Periodic Information Flows to the Supervisory Body



Corso Italia, n. 27, Bolzano (BZ)

ETHICAL CODE

VERSION	DATE OF ISSUE	COMMENT	APPROVAL
00	28-02-2025	Initial Issue	Sole Director



ETHICAL CODE

INDEX

I.	INTRODUCTION	4
1.1.	Foreword.....	4
1.2.	Objectives.....	4
1.2.1.	Compliance with regulations and the guiding principles regarding the environment and health and safety in the workplace	4
1.2.2.	Compliance with company policy regarding the Company's mission and values	5
1.3.	Addressees	5
1.4.	Ethical Principles	6
1.4.1.	Compliance with laws and regulations.....	6
1.4.2.	Fairness and Honesty.....	6
1.4.3.	Impartiality.....	6
1.4.4.	Confidentiality.....	7
1.4.5.	Conflicts of interest	7
1.4.6.	Environmental protection	7
1.4.7.	Diligence and good faith.	8
1.4.8.	Documentation of activities	8
1.4.9.	Competition	8
2.	RULES OF CONDUCT	9
2.1.	RULES OF CONDUCT RELATIVE TO COLLABORATORS.....	9
2.1.1.	Protection of the individual.....	9
2.1.2.	Compliance with laws and protection of resources	9
2.1.3.	Fair and transparent conduct	10
2.1.4.	Selection, management and evaluation of personnel	10
2.1.5.	Establishment of the employment relationship	10
2.1.6.	Personnel training.....	11
2.1.7.	Hygiene, safety and respect for the environment	11
2.1.8.	Finance, administration and control	11
2.1.9.	Conflict of interests	12
2.1.10.	Gratuities and benefits	12
2.1.11.	Protection of Privacy	12
2.1.12.	Disclosure Obligations.....	12
2.1.13.	Whistleblowing	13
2.2.	RULES OF CONDUCT RELATIVE TO SUPPLIERS OF GOODS AND SERVICES	14
2.2.1.	Criteria for the selection of suppliers.....	14
2.2.2.	Lawfulness and fairness in negotiations	14
2.2.3.	Donations and other benefits received from suppliers	14
2.3.	RULES OF CONDUCT RELATIVE TO CLIENTS	15
2.4.	RULES OF CONDUCT RELATIVE TO THE PUBLIC ADMINISTRATION	15
2.4.1.	Legality, fairness and transparency in relations with the Public Administration	16
2.4.2.	Gratuities and benefits	16
2.4.3.	Business and collaborative relationships.....	17
2.4.4.	Loans, grants and subsidies	17
2.4.5.	Conflict of interests	17
2.4.6.	IT System	18
2.4.7.	Involvement in legal proceedings	18
2.5.	RULES OF CONDUCT RELATIVE TO OTHER PARTIES.....	18



ETHICAL CODE

2.5.1.	Market.....	18
2.5.2.	Political organizations and trade unions	19
2.5.3.	Media.....	19
2.6.	RULES OF CONDUCT REGARDING FINANCIAL STATEMENTS (CORPORATE CRIMES)	19
2.6.1.	Corruption among private parties	20
2.6.2.	Correctness of operations.....	20
2.6.3.	Collection and payment methods	21
	Collections and payments must be made, where possible, preferably through bank remittances and/or bank cheques, and collections and payments made using cash must always be documented.	21
2.7.	RULES OF CONDUCT REGARDING HEALTH AND SAFETY IN THE WORKPLACE AND ENVIRONMENTAL PROTECTION	21
2.7.1.	Health and Safety in the workplace.....	21
2.7.2.	Environmental protection	21
2.8.	RULES OF CONDUCT RELATIVE TO OFFENCES AGAINST THE PUBLIC TRUST	22
2.9.	RULES OF CONDUCT RELATIVE TO COMPUTER CRIMES AND UNLAWFUL DATA PROCESSING.....	23
2.10.	RULES OF CONDUCT RELATING TO CRIMES AGAINST INDUSTRY AND TRADE AND TO BREACH OF COPYRIGHT	23
2.11.	RULES OF CONDUCT RELATIVE TO THE OFFENCES OF TERRORISM, HANDLING STOLEN GOODS, MONEY LAUNDERING, SELF-LAUNDERING AND OFFENCES AGAINST THE FUNDAMENTAL RIGHTS OF FREEDOM	24
2.12.	RULES OF CONDUCT FOR THE PREVENTION OF OFFENCES RELATING TO RACISM AND XENOPHOBIA	24
2.13.	RULES OF CONDUCT RELATING TO TAX OFFENCES AND SMUGGLING OFFENCES	25
3.	RULES OF CONDUCT RELATIVE TO COMPLIANCE WITH PROHIBITORY SANCTIONS.....	26
4.	ENFORCEMENT, MONITORING AND DISCIPLINARY PROCESSES	26
4.1.	Supervisory Body	26
4.2.	Adherence to the code and reporting of violations	26
4.3.	Communication and training.....	27
4.4.	Disciplinary System	27



ETHICAL CODE

1. INTRODUCTION

1.1. Foreword

Akifix S.p.A. (hereinafter also “Akifix” or the “Company”) is a leading company in the field of fasteners and components for plasterboard and accessories for external thermal insulation composite systems. It currently serves more than 3,500 customers in 53 countries and offers a portfolio of over 5,000 products. Over the years, the Company has diversified beyond its traditional sectors (plasterboard and insulation), expanding into other market segments including, by way of example, lighting, paints and painting tools, and electrical products.

Each sector is associated with a dedicated corporate brand, ensuring full visibility and traceability of the Company’s products. The entire process—from product selection and design through to after-sales support—is managed entirely by a highly specialized team.

The Company’s founding values are honesty, transparency, innovation, and social and environmental responsibility, stemming from a strong and well-recognized corporate culture.

For this purpose, the Company has defined an Ethical Code in which to define and formalize the rules and principles of conduct in order to express the set of values with which the Company identifies and which it shares. Therefore, the Ethical Code represents the commitment to moral integrity and economic and social responsibility, which constitutes the Company’s primary and core values.

1.2. Objectives

The primary objective of the Ethical Code is to make common and widespread the ethical values with which the Company identifies, at all levels, so that all of the individuals operating for and on behalf of the Company have such principles at the core of their actions and not only compliance with the rule of law which is essential in itself.

The Ethical Code has also been adopted in compliance with the provisions of Legislative Decree 231/2001 and in compliance with company policy regarding the mission and the values of the Company.

1.2.1. Compliance with regulations and the guiding principles regarding the environment and health and safety in the workplace

The Ethical Code has been adopted in compliance with regulations regarding the environment and health and safety in the workplace, absorbing the guiding principles and integrating them into company policy regarding the Company’s mission and values and which can be summarized as follows:

- protection of the environment, considering among its main objectives the commitment to research and to the continual improvement of production processes in accordance with the current



ETHICAL CODE

legislation, with environmental requirements and with the common interest, applying the best economically feasible technologies available in order to minimize direct and indirect environmental impact;

- protection of the health and safety of employees, promoting responsible and safe behaviour and adopting all of the safety measures made necessary by the technological evolution in order to guarantee a safe and healthy working environment, in full compliance with current legislation regarding prevention and protection.

1.2.2. Compliance with company policy regarding the Company's mission and values

The principles on which the Ethical Code is founded must also be encompassed in the company policy regarding the Company's mission and values in relation to the factors of company management discussed in the subsequent paragraphs of this Code.

The Company works to maintain the standards of excellence in the sector in which it operates and constantly strives for continuous improvement in order to progressively develop its activities and to increase its visibility and presence nationally and internationally.

The Company operates to become a point of reference in its sector, creating value for its *stakeholders* in terms of ethics, business and social function, contributing to the economic and professional growth of its employees and collaborators and transferring elements of economic and civil progress to the Community in which it operates.

The Company responds to the needs of all its *stakeholders* with transparency and completeness and produces prosperity for shareholders, financiers and for workers in a manner consistent with its own vision, with the values of responsibility, transparency, trust and respect for people.

The Ethical Code is conceived as a "charter of values", containing the general principles that shape the activity of the Company: legality, fairness in relationships (with employees, with external interlocutors and in general with all *stakeholders*), protection of the environment, of health and safety in the workplace, transparency and social responsibility.

1.3. Addressees

The Ethical Code must be compulsorily adhered to by all company bodies, by all of the Company's employees and collaborators and by those who, in various capacities, act in the name of or on behalf of, and in the interests or to the advantage of the Company, independently of the legal status of the relationship. These include collaborators, in a broad sense, the Public Administration, Clients, Suppliers of goods and services, the market, political organizations and trade unions, the Media.



ETHICAL CODE

1.4. Ethical Principles

1.4.1. Compliance with laws and regulations

Each addressee of the Ethical Code must observe the essential principle of compliance with the current laws and regulations which govern their activity.

The Company must ensure an adequate training and awareness programme regarding compliance with the laws and regulations and the Ethical Code.

In general, the recipients undertake to:

- apply employment contracts fairly, foster professional development, and ensure workplace safety;
- comply with the requirements of applicable legislation on workplace health and safety and promote its implementation;
- act with fairness and integrity in dealings with clients, suppliers, and competitors;
- comply with current environmental regulations and standards;
- treat environmental protection and pollution prevention as an ongoing responsibility;
- maintain honest and transparent relationships with public authorities and political parties;
- respect and uphold all laws and regulations

1.4.2. Fairness and Honesty

The pursuit of the interests of the Company may never justify any conduct contrary to the principles of fairness and honesty.

Gifts and gratuities of a modest value are permitted, as well as other ordinary and reasonable representation expenses, provided that they do not exceed such limits as to compromise the ethical-professional integrity and correctness of the parties and, in any case, provided that they may be considered customary in relation to the occasion. Therefore, any form of benefit or gift, received or offered, which might be interpreted as an instrument aimed at influencing the independent judgement or conduct of the parties involved, must be refused.

In relations with the Public Administration, gifts and representation expenses are permitted only within the limits and according to the procedure defined in this document in paragraph 3.4 – “Rules of conduct relative to the public administration”.

In the event of any doubt in relation to gifts and representation expenses, the addressees must inform and seek advice from their direct superior and the Supervisory Body.

1.4.3. Impartiality



ETHICAL CODE

The addressees of the Ethical Code, in full accordance with the principle of good faith, operate with impartiality in the carrying out of their activities, undertaking to guarantee the principle of independent judgement and the absence of any interest, commercial or financial, which might determine biased behaviours, favourable treatment and unequal treatment.

In relationships with all counterparties, any form of discrimination based on an interlocutor's age, racial and ethnic origins, nationality, political opinions, religious beliefs, sex, sexuality or health status is strictly prohibited.

In the event of any doubt in relation to the issue in question, the addressees must inform and seek advice from their direct superior and the Supervisory Body.

1.4.4. Confidentiality

All addressees guarantee, in accordance with law, the confidentiality of the information in their possession, even after any eventual withdrawal or exclusion.

The addressees are prohibited from using confidential information for any purposes unrelated to the practices of their professional work. In particular, the information, data, knowledge acquired, processed and managed by the addressees in the practice of their work must remain strictly confidential and appropriately protected and may not be used, communicated or divulged, either inside or outside the Company, unless in accordance with current regulations and company procedures.

In the case of any doubt in relation to the issue in question, the addressees must inform and seek advice from their direct superior on the Supervisory Body.

1.4.5. Conflicts of interest

During the performance of all activities, each addressee shall seek to avoid falling into situations of conflict of interests, whether real or merely potential. Potential "conflicts of interest", in addition to those defined by law, also include the case in which one of the addressees of this code operates, within the work environment, to satisfy an interest other than that of the Company and of its stakeholders, in order to gain a personal advantage or an advantage for third parties.

In the event of any doubt in relation to the issue in question, the addressees must inform and seek advice from their direct superior and the Supervisory Body.

1.4.6. Environmental protection

The Company, aware of the impact of its activities on the socio-economic development and quality of life within its local area, is committed to safeguarding the surrounding environment and contributing to the



ETHICAL CODE

sustainable development of the territory in which it operates. This commitment is pursued through transparent business practices and the use of appropriate technologies.

In general, all recipients undertake to avoid causing harm to the environment and to actively participate in and promote initiatives related to environmental issues. To reinforce the duty of environmental protection, all recipients are required to strictly comply with applicable laws, environmental protection regulations, and hygiene directives, and to consistently maintain a responsible and vigilant attitude. In case of any doubts regarding these matters, recipients must inform and consult their direct supervisor and the Supervisory Body.

1.4.7. Dilligence and good faith.

Each addressee shall act loyally and in good faith, observing the contractual obligations undertaken and guaranteeing the services requested. Each addressee shall also know and observe the contents of this Ethical Code, behaving in accordance with respect, cooperation and mutual collaboration.

In the event of any doubt in relation to the issue in question, the addressees must inform and seek advice from their direct superior and the Supervisory Body.

1.4.8. Documentation of activities

All activities, actions, transactions and operations of each addressee must be:

- carried out in accordance with the regulations in force, with the utmost managerial fairness, with completeness and transparency of information and of legitimacy in form and substance, with an adequate traceability and documentability of the same;
- carried out in accordance with the instructions, procedures and communications issued, and within the limits of the powers delegated to them and of the budgets approved by the administrative body or by its representatives, and must also be lawful, consistent and appropriate.

Any addressees who become aware of any omissions, alterations or falsifications of the accounting records or of relative supporting documents, must inform their superior or the person in charge of the relevant company department and the Company's Supervisory Body.

1.4.9. Competition

The Company believes in free, fair, and honest competition, and directs its actions toward achieving competitive results that reward competence, experience, and efficiency.

Any conduct that may distort the conditions of fair competition is contrary to corporate policy and is strictly prohibited for anyone acting on behalf of the Company.



ETHICAL CODE

Under no circumstances may the Company's interests justify behavior that violates applicable laws or the principles set forth in this Code.

In all external communications, information regarding the Company and its activities must be truthful, clear, and verifiable.

In case of uncertainty regarding these matters, recipients must inform and consult their direct supervisor and the Supervisory Body.

2. RULES OF CONDUCT

2.1. RULES OF CONDUCT RELATIVE TO COLLABORATORS

For the purposes of this Code, the term "Collaborators" shall broadly include:

- individuals who, formally or in practice, perform management, administrative, or supervisory functions within the Company (including Directors, Statutory Auditors, Executives, etc.);
- employees governed by applicable laws and/or the provisions of the relevant National Collective Labor Agreements;
- all persons who, by virtue of a mandate, contractual collaboration, assignment of duties or powers, and/or other agreements, act in the name of, on behalf of, or in the interest of the Company.

2.1.1. Protection of the individual

The Company recognizes the value of human resources, respect for their autonomy and the importance of their participation in business activities.

Akifix S.p.A. is committed to ensuring the necessary conditions to maintain a collaborative and cordial work environment and to prevent discriminatory conduct of any kind.

2.1.2. Compliance with laws and protection of resources

The Company upholds full compliance with the laws and regulations in force in all countries where it operates as a fundamental and non-negotiable principle.

Each Collaborator must act with the care and diligence of a prudent person, maintaining full awareness—within their area of responsibility—of the rights and obligations of the Company arising from laws, contracts, or relationships with public authorities.

No conduct that could in any way harm the Company's interests shall be permitted.

Furthermore, each Collaborator is responsible for safeguarding, preserving, and protecting the Company's assets and resources entrusted to them in the course of their duties, and must use them properly and in accordance with the Company's best interests.



ETHICAL CODE

2.1.3. Fair and transparent conduct

The Company requires all Collaborators to maintain a proper and transparent conduct in the performance of their duties, in full compliance with the principles set forth in this Code of Ethics. Specifically, such conduct must be demonstrated in response to any request made by shareholders, corporate bodies responsible for statutory auditing and internal control, as well as by the external auditing firm in the exercise of their respective institutional functions. Collaborators, within the scope of their specific responsibilities, must adopt an attitude of maximum openness and cooperation during audits and inspections carried out by the competent public authorities, and must not obstruct in any way the activities of supervisory and control bodies.

2.1.4. Selection, management and evaluation of personnel

Without prejudice to the obligations deriving from the provisions in force, the selection of personnel is subject to verification of the full compliance of the candidates with substantial adherence to the professional profiles required by the Company, in compliance with equal opportunities for the interested parties.

The Company adopts appropriate measures to avoid favouritism, nepotism or forms of clientelism in the selection and hiring phases.

The hiring of staff takes place in accordance with regular employment contracts inspired by the provisions of the applicable National Collective Employment Contract and in full compliance with the legislation concerning working hours, rest periods and holidays. Any form of working relationship that does not comply with or otherwise circumvents current regulatory provisions is not permitted. In this sense, the Company firmly condemns the use, hiring or employment of manpower through any form of illicit intermediation activity - including that sanctioned by art. 603 bis c.p. - which involves the exploitation of the worker and takes advantage of the state of need in which he may find himself. To this end, the Company has also implemented specific safeguards and controls, to prevent even the companies it qualifies as its service providers from employing manpower recruited using the aforementioned methods.

If annual objectives are established, both general and individual, the Company undertakes to support a remuneration policy based on possible, specific, concrete, measurable and credible objectives related to the time expected for their achievement.

2.1.5. Establishment of the employment relationship

Upon establishment of the employment relationship, the Company undertakes to provide each employee with accurate information relative to the employment relationship:



ETHICAL CODE

- place of work, duration, framework, level, position and duties, duration of the probation period if applicable, amount of remuneration, Collective Labour Agreement applied;
- standards and procedures to be adopted in order to avoid any conduct which violates legal and contractual provisions and company regulations.

Such information is presented to the employee so that acceptance of the position is based on an effective knowledge and understanding of the same.

2.1.6. Personnel training

In accordance with the principles of “equal opportunity” and “non-discrimination” the Company provides all employees with information and training tools with the aim of valorising and expanding the skills of its personnel.

The training may be institutional in nature and delivered at specific times during the employee’s career at the company (for example, for newly appointed employees, introduction to the company and its business activities, training relative to safety at work) or it may be professional in nature and geared towards development, that is, intended to strengthen the system of management of personnel based on the “value of the person” and their contribution in terms of skills, flexibility, results and involvement.

2.1.7. Hygiene, safety and respect for the environment

The Company aims to maintain the highest standards of hygiene and safety and to guarantee all necessary measures for the prevention of accidents and illness at work.

All Collaborators must contribute to keeping the work environment in which they operate safe and healthy in full compliance with the legal, contractual and company regulations.

With regards to environmental protection, the Company operates in full compliance with all relevant laws in the best possible manner and adopts all necessary measures to prevent any form of pollution.

2.1.8. Finance, administration and control

In the preparation of documents and accounting data, reports and other company communications provided for by law and intended for shareholders, the public or the auditing firm, as well as in all management-related records, the Collaborators must uphold the strictest principles of transparency, fairness and truthfulness.

In particular, all Collaborators called upon to process and draft the aforementioned documents are required to verify, each for their own respective sections, the accuracy of the data and information processed in order to ensure the accuracy and veracity of such documents mentioned above.



ETHICAL CODE

Each bookkeeping record must reflect exactly the content of the supporting documentation which must be complete and verifiable.

2.1.9. Conflict of interests

Each Collaborator, in the broad sense, must ensure that every decision made within his or her scope of activity, is made in the interest of the Company and in compliance with the plans and guidelines of the corporate body. Therefore, any situation of conflict of interest between personal or family economic activity and the work performed on behalf of the company must be avoided.

Before accepting a consultancy, administrative or any other appointment for any subject other than the Company, which might potentially be in conflict with the interests of the same, each employee is required to inform his or her supervisor who, in turn, is obliged to inform the Supervisory Body of the actions taken to exclude any impact of such conflict of interest on the management of the company.

2.1.10. Gratuities and benefits

Expressions of business courtesy, such as gifts or certain forms of hospitality, may be offered, provided that they have been duly authorized in advance, if and when they are of modest value and, in any case, such that they may not be interpreted, by an impartial observer, as being aimed at securing an advantage, whether economic or non-economic, in violation of the applicable laws, regulations and principles of this Code.

Gratuities and benefits (money, items, services, favours or other benefits) which are not directly attributable to ordinary courtesy may not be offered, directly or indirectly, to third parties, private parties or representatives of the Public Administration.

In particular, the Collaborators are required to not make and to refuse payments which might be considered to be in violation of laws, regulations and the principles of this Code.

2.1.11. Protection of Privacy

The Company safeguards the privacy of its Collaborators according to relative regulations in force, committing to not disclose or disseminate, unless obliged by law, their personal information without prior consent of the individual concerned.

The collection, processing, and storage of such information are carried out through specific procedures designed to ensure full compliance with privacy protection regulations.

2.1.12. Disclosure Obligations



ETHICAL CODE

All Collaborators are required to promptly and confidentially report to their department managers and/or to the Supervisory Body, all information that they come to acquire during the course of their work, regarding violation of legal regulations, of the Ethical Code or other company regulations which could involve the Company in any way.

The department managers must oversee the work of their employees and they must constantly and promptly inform the Supervisory Body.

2.1.13. Whistleblowing

Akifix S.p.A. promotes the prevention and verification of any illegal conduct or, in any case, contrary to the Code of Ethics. The Company encourages Recipients to promptly report, through dedicated channels, any illegal conduct or, in any case, contrary to the Code of Ethics, of which they become aware due to their relationships with the Company. Except in cases of liability for slander or defamation, or under the same title pursuant to Article 2043 of the Italian Civil Code, any Recipient who, in good faith, reports unlawful conduct or behavior that violates the Code of Ethics and Conduct—of which they have become aware through their relationship with the Company—shall not be subject to disciplinary action.

Any form of retaliation or discriminatory measure, direct or indirect, having effects on working conditions for reasons directly or indirectly linked to the complaint is not permitted or tolerated towards Collaborators who make reports within the whistleblowing system introduced by the Company.

For this purpose, discriminatory measures include unjustified disciplinary actions, harassment in the workplace and any other form of retaliation that leads to intolerable working conditions.

Furthermore, any form of abuse of the whistleblowing system is prohibited, carried out through manifestly opportunistic reports and/or made for the sole purpose of harming the reported person or other subjects, as well as through improper use or intentional exploitation of the institution.

To ensure the effectiveness of its whistleblowing system, the Company has established a Whistleblowing Procedure that governs reports submitted by employees, directors, members of corporate bodies, and other authorized third parties. All such individuals have been informed of the existence of dedicated communication channels that allow them to submit reports based on clear and consistent factual elements, with full assurance—also through digital means—of the confidentiality of the whistleblower's identity. To this end, the Company has implemented internal reporting channels which, in compliance with applicable legislation and relevant best practices, guarantee the confidentiality of both the whistleblower and the subject of the report. These channels are accessible at the following link <https://akifix.smartleaks.cloud/#/>



ETHICAL CODE

All reports deemed relevant pursuant to Legislative Decree No. 231/2001 shall be forwarded—following an assessment of their validity—by the Whistleblowing Manager to the Supervisory Body appointed by the Company.

2.2. RULES OF CONDUCT RELATIVE TO SUPPLIERS OF GOODS AND SERVICES

2.2.1. Criteria for the selection of suppliers

The supplier selection process takes place in accordance with the principles of fairness, low cost, quality, innovation, collaboration and legality on the basis of objective evaluation aimed at safeguarding the Company's commercial and industrial interests and, in any case, creating more value for the same.

The supplier's adherence to this Code, as well as compliance with the regulations in force, including those regarding the management of relations with the Public Administration, is a necessary condition for the initiation or continuation of negotiations.

2.2.2. Lawfulness and fairness in negotiations

Collaborators who make any purchase of goods and/or services must always act in compliance with the principles of fairness, low cost, quality and legality, operating with due diligence and prudence.

The company establishes commercial relationships and contracts with their Suppliers in a manner which is fair, complete and transparent, in an effort to foresee any circumstance which might significantly impact the relationship established.

The Suppliers must be informed of the Company's adoption of this Ethical Code, and the knowledge of and compliance with this document constitute an express contractual obligation.

2.2.3. Donations and other benefits received from suppliers

Employees must avoid receiving, directly or indirectly (e.g. through members of their own/ nuclear families, friends, acquaintances):

- money or other any advantage or benefit from anyone other than the Company for the performance of their official duties or any act performed in conflict with their official duties;
- gifts, gratuities, hospitality or other benefits, unless the value of the same does not exceed the limits ascribable to ordinary courtesy and is of modest value and customary in relation to the occasion.



ETHICAL CODE

2.3. RULES OF CONDUCT RELATIVE TO CLIENTS

The Company pursues its corporate success on the markets by offering quality products and services under competitive conditions while complying with the regulations put in place to safeguard fair competition.

The Company recognizes that the approval of those who request the products and services is of primary importance for the success of the business. Commercial policies are aimed at ensuring the quality of goods and services, safety and due regard for the principle of precaution.

Therefore, the Company's collaborators are obliged to:

- comply with internal procedures for the management of relationships with clients;
- supply, efficiently and courteously, within the limits specified in the contract, high-quality services which meet the reasonable expectations and needs of the clients;
- provide complete and accurate information on products and services and to uphold the truth in advertising campaigns or other forms of communication, so that clients may make informed decisions.

2.4. RULES OF CONDUCT RELATIVE TO THE PUBLIC ADMINISTRATION

The Company's conduct is inspired and adapted in accordance with the principles of legality, fairness and transparency, so as not to lead the Public Administration into violation of the principles of impartiality and good practice which it is required to uphold.

The concept of Public Administration, in criminal law, is intended in a broad sense, and includes all the activity of the State and of other public entities.

The term "Public Administration" includes the following definitions:

A. Public Official

Article 357 of the penal code defines "*Public official*" as a person who "*carries out a legislative, judicial or administrative public function. An administrative function is public when it is regulated by the provisions of public ¹ law and by authoritative acts, characterized by the formation and manifestation of the will of the Public Administration or by its implementation by means of authoritative powers ² or certification powers.³*".

B. Public Service Employee

¹ "*Public Law provisions*" are those aimed at the pursuit of a public purpose and the protection of a public interest.

² "*Authoritative power*" is the power that allows the Public Administration to fulfil its duties by means of real commands, to which the private citizen is subject. This regards activities which involve exercise of the so-called public powers, which include both powers of coercion (arrest, search etc.) and notification of breach of law (investigation of offences etc.), as well as the powers of hierarchical supremacy within public offices.

³ "*certification power*" is that which attributes to certifier the power to certify a fact that can be used as evidence pending proceedings challenging it as a forgery.



ETHICAL CODE

Article 358 of the Italian penal code defines “public service employee” as an individual who *“in whatever capacity”⁴ performs a public service⁵”*.

The relationship with the Public Administration is to be considered ethically sensitive and requires a high level of attention.

The Company requires compliance with the principles of legality, correctness, transparency and integrity in order not to induce the Public Administration to the violation of the principles that govern and guarantee the good performance and impartiality of its actions. The Company establishes relationships with the Public Administration strictly observing the regulatory provisions, applicable regulations, provisions contained in the internal procedures, so as not to compromise its reputation and integrity.

2.4.1. Legality, fairness and transparency in relations with the Public Administration

With regard to any relations with the Italian and/ or foreign Public Administrations, it is not permitted, for any reason, to engage in any behaviour aimed at unlawfully influencing the decisions of Public Officials or Public Service employees, in order to secure an unfair or unlawful profit or advantage.

The objective of ensuring the independence and autonomy of representatives authorized to enter into relations with the Public Administration is also pursued through the selection of individuals who are not in situations of conflict, directly or indirectly, in relation to the representatives of the same institutions.

During a business negotiation, request or relationship of any nature with the Public Administration, actions must not be undertaken, directly or indirectly, which may propose employment and/or commercial opportunities from which advantages derive, for oneself or for others, to employees of the Public Administration or their relatives or in-laws.

2.4.2. Gratuities and benefits

The Company condemns any behavior, by anyone, consisting of the direct or indirect promise or offer of gratuities and benefits (money, items, discounts, services, favours or other benefits) to Italian or foreign Public Officials and / or Public Service employees, or their relatives, which could result in an unfair or illegal interest and/or advantage.

⁴ “*in whatever capacity*” is to be understood in the sense that a subject performs a public function, taking care of public interests or the satisfaction of the needs of general interest, subject to the supervision of a public authority, even without a formal or regular investiture (“*de facto*” public service employee). In fact, it does not concern the existing relationship between the Public Administration and the subject who carries out the activities. Therefore, even a private individual or an employee of a private company may qualify as a public service employee when engaged in activities in pursuit of a public purpose and the protection of public interest.

⁵ “*Public Service*” is to be understood as an activity governed by the regulations of public law and by authoritative acts, but without authoritative and certifying powers.



ETHICAL CODE

Specifically, it is prohibited to promise and/or offer any gratuity and/or benefit in order to:

- obtain more favourable treatment in relation to any relations with the Italian or foreign Public Administrations;
- induce Italian or foreign Public officials / public service employees to use their influence on other subjects belonging to the Italian or foreign Public Administrations.

Gifts and acts of courtesy and hospitality to representatives of the Public Administration are only permitted on the condition that their modest value does not compromise the integrity, independence and reputation of one of the parties. In any case, this type of activity must be appropriately authorized and documented.

2.4.3. Business and collaborative relationships

It is permitted to hire or engage in business relationships (economic and/or financial) with current or former employees of the Italian or foreign Public Administration, or with their relatives and close associates, only if such relationships are explicitly and proactively brought to the attention of the Supervisory Body and evaluated by it both during the hiring process and in the definition of the business relationship.

2.4.4. Loans, grants and subsidies

It is prohibited to allocate loans, grants and subsidies, even sums of modest value, obtained from the State or other public entity or from the European Community for purposes other than those for which they are granted.

The Company condemns any conduct intended to obtain any type of grant, loan, subsidised loan or other type of financing from the State, from the European Community or from other national or foreign public entities, through the use of intentionally altered or forged statements or documents or through the omission of information or, more generally, through artifices or fraud, including via computer or telematic systems, with the intention to mislead the disbursing entity.

2.4.5. Conflict of interests

The Company may not be represented in its relationships with Italian or foreign Public Administrations, by subjects who might be in any situation of conflict of interests.

In this respect, all employees, in the broad sense, are required to inform their hierarchical superiors of the existence of conflict of interests with Italian or foreign Public Administrations and to abstain from carrying out or participating in acts which might prejudice the Company or third parties or jeopardize their image.

Appropriate communication regarding the existence of situations of conflict of interests must also be addressed to the Supervisory Body, along with the measures put in place to exclude any impact of the same conflict of interest on the management of the company.



ETHICAL CODE

2.4.6. IT System

The Company strictly prohibits any alteration of the functioning of an IT or telematic system, as well as any unlawful interference—by any means—with the data, information, or programs contained in or related to such systems. This prohibition is further reinforced in cases where the affected party is the State or a public entity.

2.4.7. Involvement in legal proceedings

Relationships with the Judicial Authority are reserved exclusively for expressly designated company subjects and are based on principles of correctness and transparency, respecting the reciprocal roles, excluding any behavior and/or attitude aimed at improperly and/or unduly influencing their work or that it can even just appear so.

In relation to the Judicial Authority, it is expressly forbidden to:

- exhibit incomplete documents and data and/or communicate false and/or altered data;
- subtract or omit the production of complete, faithful and truthful documents;
- omit required information.

During any proceedings before the Judicial Authority, it is strictly forbidden to engage (directly or indirectly) in any unlawful activity that could unduly favor or harm any of the parties involved, including third parties (e.g. external professionals).

Furthermore, it is prohibited to unduly promote the interests of the Company by inducing, through violence or threats, or alternatively by offering money or other benefits, any person called to testify before the Judicial Authority to make false statements or declarations admissible in criminal proceedings. Recipients of requests for undue advantage, or those subjected to any form of intimidation or harassment by the Authority, must report such conduct without delay.

2.5. RULES OF CONDUCT RELATIVE TO OTHER PARTIES

Other than the parties considered above, the Company maintains relations with other parties regarding which it has defined the following rules of conduct.

2.5.1. Market

The Company is committed to promoting maximum competitiveness in the market and, accordingly, its commercial policy evolves in full compliance with all applicable laws and regulations in force at the time concerning competition.



ETHICAL CODE

The Company ensures compliance with legislation protecting the rights of competitors and consumers and undertakes not to enter into any formal or informal agreements with competitors that could hinder the determination of prices based on standard competitive practices.

2.5.2. Political organizations and trade unions

Relations with political and trade union organizations are reserved for the corporate functions expressly authorized to establish and manage such relations, based on their assigned responsibilities and in accordance with the service orders and procedures in force at the time.

2.5.3. Media

Information regarding the Company that is addressed to the mass-media may only be divulged by the company officials delegated to do so, in compliance with the protocols and procedures in force. When requested to supply information or give interviews, the Collaborators must communicate such to the relevant department and receive prior specific authorization. In any case, any communication of data or information outside the Company must be truthful, transparent and such that it uniformly reflects the image and the strategies adopted by the Company.

2.6. RULES OF CONDUCT REGARDING FINANCIAL STATEMENTS (CORPORATE CRIMES)

Company condemns any conduct aimed at compromising the accuracy and truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law and addresses to shareholders, the public, or the auditing firm.

All parties involved in the preparation of the aforementioned documents are required to verify, with due diligence, the accuracy of the data and information that will subsequently be incorporated into the drafting of such documents.

The Company adopts specific procedures, also to prevent the commission of corporate crimes.

The corporate bodies responsible for the preparation of the financial statements and corporate communications must carry out their activities in compliance with the procedures set out in the Company's compliance model, guided by the principles of fairness and good faith and acting with the ordinary diligence of a prudent person. They must also avoid situations of conflict of interest, including merely potential ones, in the performance of their delegated functions.

It is prohibited to engage in any conduct intended to impair the integrity of the Company's assets.

It is prohibited to carry out any simulated or fraudulent act intended to influence the will of the members of the shareholders' meeting to secure the irregular formation of a majority and/or a different resolution.



ETHICAL CODE

All phases relating to the shareholders' meeting, including convening the meeting and the filing of any documents deemed suitable for the adoption of resolutions by the shareholders, must be scrupulously monitored.

It is prohibited to disseminate false information, whether internally or externally, concerning the Company itself, its employees, collaborators, and third parties acting on its behalf. Directors, executives, collaborators, and employees are required to keep confidential the information and documents obtained in the performance of their duties and not to use them for their own benefit.

Individuals tasked with transmitting documents and information during audits and inspections by the competent public authorities must conduct themselves in good faith and fairness and perform their duties with due care and diligence. They must also maintain the utmost openness and cooperation towards the inspecting and supervisory bodies.

It is prohibited to obstruct in any way the functions of public supervisory authorities that come into contact with the Company in the exercise of their institutional duties.

2.6.1. Corruption among private parties

In full compliance with the principles set out above, the Company undertakes to prevent and hinder any form of bad management connected to a phenomenon of deviation from the good corporate performance. To this end, the Company condemns any behavior aimed at altering the correctness and transparency of commercial relations between companies and, in particular, prohibits the Recipients from giving or promising money or other benefits, the administrators, the general managers, the managers responsible for drafting of corporate accounting documents, to the auditors and liquidators of another company or private entity, so that they carry out or omit acts, in violation of the obligations inherent to their office or of the obligations of loyalty, in order to obtain an advantage for the Company. The incriminating ratio of the rule is to be seen in the need to repress the forms of bad management connected to a phenomenon of deviation from the good corporate performance (e.g. the Sales Manager gives or promises money or other benefits to the Purchasing Officer of another company so that he chooses his own company as supplier, loading the cost of the utility or money given or promised onto the price).

2.6.2. Correctness of operations

All operations and transactions, broadly understood, must be authorized and recorded in accordance with the principles of fairness, integrity and impartiality.

The Company's collaborators are required to act with due diligence to ensure that all activities are supported by proper authorization procedures and by documentary and/or digital evidence.



ETHICAL CODE

The Company upholds the principle of ethical conduct in business activities. Any behavior – whether direct or through third parties – that facilitates money laundering, handling of stolen goods, use of assets or benefit of illicit origin, or self-laundering, whether at the national or international level, is strictly prohibited.

2.6.3. Collection and payment methods

Collections and payments must be made, where possible, preferably through bank remittances and/or bank cheques, and collections and payments made using cash must always be documented.

2.7. RULES OF CONDUCT REGARDING HEALTH AND SAFETY IN THE WORKPLACE AND ENVIRONMENTAL PROTECTION

2.7.1. Health and Safety in the workplace

The Company guarantees its employees and collaborators the ability to carry out their activities in a work environment that is adequate to safeguard their health, safety and physical and moral integrity, in compliance with the laws and regulations in force. For this reason, the Company promotes responsible and safe conduct and adopts all of the safety measures made necessary by the technological evolution in order to guarantee a safe and healthy work environment, and, specifically, to prevent and impede the crimes of negligent manslaughter and serious and extremely serious negligent bodily harm committed in breach of regulations for the prevention of accidents and for the protection of health and hygiene in the workplace. The Company, therefore, commits to fulfil all of the legal obligations pursuant to Applicable Law.

Anyone who identifies deficiencies or inadequacies in the workplace, equipment, or protective devices provided by the Company, as well as any other situation posing a risk to health and safety at work, is required to promptly and appropriately report such issues to the responsible parties (Health and Safety Officer (RSPP), Workers' health and safety officer (RLS), Managers, Supervisors) and/or to the Supervisory Body.

2.7.2. Environmental protection

The Company, during the carrying out of its activities, without prejudice to the specific applicable legislation, adopts suitable measures to preserve the environment and the community, promoting the development of activities in accordance with this objective and committing to awareness initiatives.

The basis of the Company's environmental policy is expressed by the belief that the environment is a common good to be safeguarded.

The Company guarantees transparent management of environmental aspects, the active participation of all employees and the constant monitoring of company processes, as well as the identification of industrial solutions with lower environmental impact.



ETHICAL CODE

Collaborators, in carrying out their daily work activities, are required to pay attention to consuming paper, water and energy in a sustainable way, as well as to respect the provisions relating to waste separation.

In order to strengthen the duty of environmental protection, the Company scrupulously complies with the legal requirements and other directives regarding environmental protection and hygiene and undertakes to always maintain correct and vigilant behaviour.

The Company undertakes to train its collaborators so that they are aware of the environmental aspects and impacts connected to their activities and to reduce the effects of their actions, in compliance with the provisions of Company procedures.

The Company manages its activities by pursuing excellence in the field of environmental protection, setting itself the objective of continuously improving its performance.

Aware of the impact of its activities on the socio-economic development and the quality of life of the local area, the Company undertakes to:

- adopt a preventive approach to the management of environmental impacts;
- implement appropriate maintenance activities on plant and equipment, optimising the use of raw materials and energy, seeking to reduce consumption and emissions, and minimising adverse effects on the environment and risks to health and safety in the workplace;
- pursue improved environmental performance through the proper use of natural resources, promoting energy efficiency and the use of alternative energy sources;
- ensure the monitoring of business processes, reviewing them periodically in light of new information and ensuring the traceability of the audits and checks carried out;
- use innovative and environmentally friendly equipment to deliver efficient and technologically advanced services.

The Company conducts a periodic process to identify and assess the specific risks associated with the management of environmental aspects, such as supplier management and evaluation.

2.8. RULES OF CONDUCT RELATIVE TO OFFENCES AGAINST THE PUBLIC TRUST

Any persons who, in the performance of their assigned role within the Entity, makes or receives cash payments must comply with the provisions of internal procedures.

If they receive coins or banknotes that they suspect may be counterfeit, they must report the matter without delay to the relevant corporate bodies, which shall in turn notify the competent authorities and, where appropriate, the Supervisory Body, in order to assess the situation may constitute a breach of Company procedures.



ETHICAL CODE

The same conduct must be observed by anyone who become aware – whether directly or incidentally – of behaviour that may be harmful to the Company in the course of, or in connection with the performance of their duties.

2.9. RULES OF CONDUCT RELATIVE TO COMPUTER CRIMES AND UNLAWFUL DATA PROCESSING

The Company adopts appropriate measures to ensure the correct use of its computerized or telematic services in such a way as to guarantee the integrity and authenticity of the data processed, to protect the interests of the Company and third parties, with particular reference to the Authorities and Public Institutions.

For this reason, the Company undertakes to guarantee that computerized and telematic data is accessed in full compliance with the regulations in force so as to guarantee the confidentiality of the information and ensure that such data is processed exclusively by individuals expressly authorized to do so. With respect to the use of IT systems, each employee is responsible for the security of the systems used and is subject to the regulatory provisions in force and the conditions of the license agreements.

Employees, members of corporate bodies and collaborators undertake not to use, for private interests or purposes, IT assets or equipment as well as any other information at their disposal for official reasons.

Accordingly, any improper use of IT tools that could give rise to conduct constituting unauthorised access to a third party's computer or electronic communications system; the unlawful interception, obstruction, or interruption of computer or electronic communications; the damage or destruction of information, data, or computer programs, whether private or used by the State or by another public body or otherwise of public utility; or damage to computer or electronic communications systems, whether private or of public utility, is strictly prohibited and entirely contrary to the Company's principles.

It is also strictly prohibited to unlawfully possess or disclose access codes/credentials to computer or electronic communications systems; to distribute equipment, devices, or software designed to damage or disrupt a computer or electronic communications system; and to install equipment intended to intercept, obstruct, or interrupt computer or electronic communications.

2.10. RULES OF CONDUCT RELATING TO CRIMES AGAINST INDUSTRY AND TRADE AND TO BREACH OF COPYRIGHT

The Company undertakes to guarantee compliance with the legislation regarding the protection of fair trade.



ETHICAL CODE

The Company's essential principle is to respect the prohibition imposed by law regarding the marketing of products which by origin, provenance, quality or quantity are different from those declared or agreed upon, or which are not genuine.

Akifix S.p.A. furthermore undertakes not to use and market products with a mark on the origin, provenance and composition of the altered or counterfeit product (labelling).

The Company also undertakes to guarantee compliance with the legislation regarding the protection of trademarks, patents, industrial designs and other distinctive signs, as well as compliance with current regulations on copyright.

The Company also undertakes not to use works protected by the rights of others in the absence of suitable permission from the author.

2.11. RULES OF CONDUCT RELATIVE TO THE OFFENCES OF TERRORISM, HANDLING STOLEN GOODS, MONEY LAUNDERING, SELF-LAUNDERING AND OFFENCES AGAINST THE FUNDAMENTAL RIGHTS OF FREEDOM

The Company gives considerable importance and value to the principles of democratic order and freedom of political determination. For this reason, the Company condemns the use of its resources for the financing and commission of any activity intended for the purposes of terrorism or the subversion of democratic order.

The Company obstructs any conduct which might constitute or be connected to transnational crimes relative to organized crime, including the mafia, money laundering, self-laundering, and the possession and use of money, goods or other benefits of illegal origin.

Furthermore, the Company considers the protection of personal integrity, of freedom and of the individual to be primary concerns. Therefore, with regards to the legislation in force, the Company undertakes to adopt the most appropriate measures of control and surveillance in order to prevent any possible conduct aimed towards the commission of crimes against the fundamental rights of freedom.

Each employee or collaborator who, during the fulfilment of his/her duties, becomes aware of the commission of any of the acts or conducts mentioned above, is required to promptly inform his/her superiors and the Supervisory Body.

2.12. RULES OF CONDUCT FOR THE PREVENTION OF OFFENCES RELATING TO RACISM AND XENOPHOBIA

The Company regards compliance with legislation on combating certain forms and expressions of racism and xenophobia as a fundamental value. Accordingly, it repudiates any activity that may involve the



ETHICAL CODE

propagation of ideas based on racial or ethnic superiority or hatred; the incitement to commit or the commission of acts of discrimination on racial, ethnic, national or religious grounds; the incitement to commit or the commission of violence or acts provoking violence on racial, ethnic, national or religious grounds—even where such conduct takes the form of denial, gross minimisation, or glorification of the Holocaust (Shoah) or of crimes of genocide, crimes against humanity, and war crimes.

Any employee or collaborator who, in the course of their work, becomes aware of the commission of acts or conduct of racism and xenophobia, as identified above, must, without prejudice to any statutory obligations, promptly report it to their superiors and to the Supervisory Body.

2.13. RULES OF CONDUCT RELATING TO TAX OFFENCES AND SMUGGLING OFFENCES

The Company promotes the principle of transparency in the maintenance of accounting records and in tax filings and requires that all parties in any way involved in activities aimed at filing income tax or value-added tax (VAT) returns, or other tax-relevant returns, comply with statutory and regulatory requirements as well as the Company's internal procedures.

Recipients, each according to their role and responsibilities, must therefore:

- conduct themselves in a transparent and proper manner, ensuring compliance with statutory and regulatory requirements and with internal Company procedures, in all activities aimed at preparing income tax and VAT returns;
- ensure the transparency and accuracy of accounting records and related financial flows;
- ensure ex post traceability of activities and the related control measures;
- conduct appropriate selection and qualification (due diligence) of counterparties;
- promote the principles of lawfulness, fairness, and transparency in the selection of professionals who manage tax compliance;
- conduct themselves in a transparent and proper manner, ensuring compliance with statutory and regulatory requirements in the structuring of extraordinary transactions relating to the disposal or transfer of corporate assets;
- ensure compliance with applicable tax law in order to guarantee the correct assessment, certification, and settlement of taxes.

The Company prohibits any conduct that contravenes customs regulations in relation to goods subject to customs duties. Therefore, where the Company purchases or exports goods, all activities and transactions undertaken must be carried out in compliance with applicable laws, as well as the principles of fairness and transparency, with the aim of preventing the commission by Recipients of smuggling offences.

The Company therefore undertakes to ensure the issue of accounting and tax documentation consistent with the import/export operations actually carried out. It is therefore prohibited to import, transport,



ETHICAL CODE

possess, or trade goods in breach of the requirements, prohibitions, and restrictions in force under customs law.

3. RULES OF CONDUCT RELATIVE TO COMPLIANCE WITH PROHIBITORY SANCTIONS

The Company seek to instil in its employees and collaborators the ethical principles that must guide all their activities, including in cases where the Company is involved in legal proceedings that result in a finding of liability pursuant to Legislative Decree 231/2001.

Should administrative liability be attributed to the Company, leading to the application of one of the prohibitory measures under Articles 13 et seq. of the Decree, all Recipients of this Code of conduct - as identified in the preceding sections - are required to uphold the principle of compliance with such prohibitory sanctions, in accordance with Article 23 of Legislative Decree 231/2001.

Accordingly, the Company condemns any form of active or passive conduct by individuals engaged in corporate activities, in any capacity, that result in a breach of the obligations arising from any prohibitory measure imposed on the entity following the confirmation of administrative liability.

4. ENFORCEMENT, MONITORING AND DISCIPLINARY PROCESSES

4.1. Supervisory Body

The Ethical Code constitutes a general and non-derogable principle of the Organization, Management and Control Model adopted by the Company. Accordingly, the body responsible for overseeing the correct and timely implementation of the Model, as well as compliance with the principles set out in this Ethical Code, is the Supervisory Body, which operates in coordination with the relevant corporate bodies and departments.

In performing its duties, the Supervisory Body has unrestricted access to all company data and information necessary to carry out its activities.

Corporate bodies and their members, employees, consultants, collaborators and third parties acting on behalf of the Company are required to provide their full cooperation to facilitate the fulfilment of the Supervisory Body's responsibilities.

4.2. Adherence to the code and reporting of violations

The corporate bodies and their members, employees, consultants, collaborators and third parties who act on behalf of the Company are required to report the following to the Supervisory Body in a timely manner:

- possible violations or induction to violation of the provisions of law or regulations, of provisions of this Ethical Code, of internal procedures and of elements of the Model;



ETHICAL CODE

- any anomaly or negligence in the keeping of accounting records, in the conservation of relevant documentation, in the fulfilment of internal accounting and management reporting obligations;
- possible requests for clarification on the evaluation of the correctness of one's own conduct or the conduct of others, as well as possible shortcomings of this Ethical Code or recommendations for modifications and /or additions to the same Ethical Code.

In order to facilitate reporting to the Supervisory Body by individuals who become aware of violations, including potential violations, of the Model, the Company has established the following dedicated channels of communication, which, in compliance with current legislation and relevant best practices, guarantee the confidentiality of the whistleblower and the reported party, accessible at the following link <https://akifix.smartleaks.cloud/#/>

The reports are kept by the Supervisory Body according to the methods indicated in its Regulation. The confidentiality of the identity of the reporter is also ensured, without prejudice to legal obligations.

4.3. Communication and training

The Ethical Code is divulged to the parties concerned, within and outside the Company, via suitable means of communication.

Within the Company, adequate knowledge and understanding of the Ethical Code by all personnel is ensured through information and training programmes defined according to the rules established by the Organization, Management and Control Model, of which the Ethical Code forms an integral part.

It is the responsibility of each employee to consult his/her direct manager for any clarification relative to the interpretation or application of the rules of conduct contained in the Ethical Code.

4.4. Disciplinary System

Compliance with the rules of the Ethical Code must be considered an essential part of the contractual obligations of the Company.

Failure to comply with the principles set out in this Ethical Code may lead to the application of sanctions in accordance with current legal provisions, the applicable Collective Labour Agreement, and the disciplinary system under Legislative Decree 231/2001, which constitutes an integral part of the Model and should be referred to accordingly.

Infractions committed by third parties shall be subject to sanctions based on the criteria outlined in the relevant contractual clauses.