



FI.MO.TEC GROUP

CODE OF ETHICS

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1. FOREWORD

The FI.MO.TEC Group (hereinafter, also "FIMO Group" or "Group") has adopted this **Code of Ethics** with the aim of defining the fundamental principles and values that guide the activities and behavior of all members and parts of the organization. Its adoption stems from the conviction that integrity, transparency and accountability are indispensable elements in building relationships of trust, both within and outside the organization.

In a context where decisions and actions can have a significant impact on people, the environment, and society, this Code of Ethics provides a clear and shared framework to guide our daily work. Through the application of the principles set out, we aim to ensure compliance with current regulations, promote a fair and safe working environment, and contribute to sustainable development and value creation for all stakeholders.

This Code therefore represents a formal and concrete commitment to pursue our goal of ethical and professional excellence while respecting core values:

Integrity and Transparency - All our actions are guided by the principles of honesty and transparency to create a climate of mutual trust.

Social Responsibility - We recognize the importance of our role in society and are committed to contributing positively to the well-being of the community and environment.

Respect and Dignity - We promote an inclusive and respectful work environment where every individual is treated with dignity and respect, regardless of race, gender, age, sexual orientation, or other personal characteristics.

Compliance with Laws and Regulations - We are committed to complying with all applicable laws and regulations, operating at all times in accordance with the current standards.

2. ADDRESSEES

This Code of Ethics applies to FI.MO.TEC. S.p.A. and all its subsidiaries, both in Italy and abroad.

All employees, directors, statutory auditors, agents, distributors, partners, consultants, suppliers, and collaborators, as well as all others who work in the name and on behalf of the Group (the "Addressees"), must be guided by compliance with the principles and lines of conduct that it lays down.

Compliance with the requirements of the Code of Ethics is an integral part of the contractual obligations of employees, in accordance with current regulations.

Violation by Addressees constitutes, depending on the case in question, a disciplinary offense (punishable in accordance with applicable regulations) and/or a breach of contract that may entail compensation for any damages to the Company arising from the said violation.

The Group requires collaborators and suppliers to respect the fundamental ethical principles on which this Code is based, also by virtue of specific contractual clauses.

3. GENERAL PRINCIPLES

The **general principles** represent the core values underpinning our ethical commitments. Used to define the guidelines for responsible and transparent behavior, they aim to ensure a working environment based on integrity, mutual respect, and accountability. These principles thus provide the framework for all our decisions and actions, such that they can contribute to sustainable development, the protection of people, and the promotion of ethical behavior, both within and outside our organization.

3.1. Compliance with laws and regulations

The Group operates in a multinational context and, for this reason, requires Addressees to comply with the laws and regulations in force in all the countries in which it operates.

Addressees must carry out their activities in conditions of maximum transparency and in absolute compliance with the laws and regulations in force where and when they are operating.

Every employee undertakes to be as knowledgeable as possible about the applicable regulations relating to their activity, and aware of their liability for any violation of the same.

In addition, each corporate department must make every effort to be fully aware at all times, within its area of responsibility, of the Company's rights arising from legal regulations, contracts, or relations with public authorities, and must not engage in any behavior that could harm the interests of the Company in any way.

3.2. Fighting corruption

The Group regards the ability to operate with loyalty, integrity, fairness, and transparency, in compliance with international laws, regulations and practices, as a cornerstone of its activity.

Addressees are required to strictly comply with laws, domestic and international, against corruption in the public or private sector. The belief of acting in the interests of or for the benefit of the Group may in no way justify violation of anti-corruption laws.

It is never permissible to pay or offer, directly or indirectly, gifts, payments, material benefits, or other advantages or benefits of any kind to third parties,

officials (including foreign ones), public service or local authority representatives, public employees or private individuals, with the aim of influencing an official act or decision, even when such behaviors are customary or seen as tolerated malpractice.

Prohibited conduct includes the offer or receipt, by Company personnel or anyone acting on their behalf, of a financial advantage or other benefit in connection with business activities. Acts of courtesy are permitted only if provided for by the regulations, and provided they are of modest value or otherwise such that they do not compromise the integrity or reputation of either party and cannot be construed as aimed at acquiring advantages improperly.

3.3. Conflict of interests

All Addressees of this Code of Ethics must avoid any situation that might be in conflict with the interests of the Group. Information acquired in the performance of assigned activities must remain strictly confidential and may not be disclosed except in compliance with current regulations.

The following are examples of conflict-of-interest situations:

- The use of one's position in the Group, or of information acquired in the course of one's duties, in a way that creates a conflict between one's personal interests and those of the Group and results in personal financial benefit;
- The acceptance of money, favors or benefits from persons and/or legal entities wishing to enter into financial agreements with the Group;
- Actions that might interfere with the ability to make fair decisions in the Group's best interests. This also includes cases in which the person giving rise to the conflicting interest is not a director, for example, but their spouse or a relative or in-law;
- Co-interest (overt or covert) in the activities of suppliers, customers or competitors.

3.4. Fighting organized crime and terrorism

The Group refrains from engaging, in any way, even indirectly or through intermediaries, with individuals or entities (natural or legal) that are known to be, or suspected of being, part of criminal organizations of any kind, including mafia-type organizations and organizations involved in human trafficking, exploitation of child labor, smuggling of foreign tobacco products, or illicit trafficking of narcotic or psychotropic substances, or who or carry out activities of any kind whatsoever in support of the same, as well as persons or groups acting for terrorist purposes, since such conduct is capable of seriously harming a country or international organization,

and is engaged in for the purpose of intimidating the population or compelling public authorities or an international organization to perform or refrain from performing some act, or with the aim of destabilizing or destroying the fundamental political, constitutional, economic and social structures of a country or international organization.

Addressees who, in the course of their work, become aware of acts or conduct that may constitute illegal activity of any kind related to the above-mentioned organized crime and terrorism offenses must immediately notify their department head.

3.5. Protection of trademarks, patents and intellectual property

The Group expressly prohibits any conduct aimed at altering, counterfeiting or making unauthorized use of domestic or foreign trademarks or distinctive symbols and designs.

It also condemns any conduct aimed at introducing into the territory of the Italian state, or the states in which it operates, industrial products bearing altered or counterfeit trademarks or other distinctive symbols, as well as the marketing of products bearing trademarks or distinctive symbols that are misleading as to the origin, provenance or quality of the product.

Likewise, the Group does not tolerate the manufacture, marketing, dissemination or mere use of objects and goods made or produced by usurping or infringing industrial property rights.

The protection of intellectual property is considered a matter of primary importance, and therefore any abusive dissemination, reproduction, use or sale of the same, for any purpose, for any use or by any means, is prohibited.

3.6. Compliance with the principles of fair competition

The Group believes in free and fair competition and uses this belief to inform actions designed to achieve competitive results that reward skill, experience and efficiency.

The Group prohibits the conclusion of agreements between enterprises, or other forms of intentional coordination, whose aim or effect is to prevent, restrict or distort competition.

It also prohibits the adoption of business strategies that, by creating economic conditions enabling the Company to establish an effective hegemony in the market and hinder fair competition, amount to abuse of its position of “leadership”.

Under no circumstances may pursuit of the Group's interests justify conduct by senior management or employees that does not comply with current local and international regulations and with the rules of this Code.

The Group also undertakes not to obstruct the work of the antitrust authorities carrying inspection activities, always ensuring maximum cooperation and providing clear, transparent and truthful information.

In any communication with the outside world, information regarding the Group and its activities must be truthful, clear and verifiable.

3.7. Confidentiality

Addressees are absolutely forbidden from disclosing to third parties any non-public information, of which they have become aware, concerning projects, acquisitions, mergers, business strategies, industrial processes, know-how, industrial secrets and, the Company generally. They are also forbidden from offering third parties advice, on the basis of such information, on any kind of financial market transaction.

It is prohibited to buy, sell, or carry out other financial and business transactions, even through intermediaries, for the purpose of profiting from them if they are based on or encouraged by the possession of confidential information and in any case information of which the Addressees have become aware in performing their tasks within the Company.

Addressees, moreover, must not disclose to the outside world information of any kind concerning the Group that is not in the public domain or whose disclosure could, in any case, be detrimental to the Group's interests.

3.8. Respect for privacy

Addressees must process personal data with absolute respect for data privacy, and in accordance with any directives given them by the relevant company representatives.

Personal data, to be processed only by entrusted Addressees, must be:

- processed lawfully and fairly;
- collected and recorded for specified, explicit and legitimate purposes and used, in other processing operations, in ways not incompatible with these purposes;
- accurate and up to date;
- relevant, complete and not excessive in relation to the purposes for which they were collected and subsequently processed;
- kept in a form which permits identification of the data subject for a period of time not exceeding that necessary for the purposes for which they were collected and subsequently processed.

The entrusted Addressees must take all appropriate measures to prevent destruction or loss, even accidental, of the aforementioned personal data, unauthorized access to the same, and unauthorized processing of the data or processing that is not in accordance with purposes of collection, as identified and periodically updated within the Group.

4. HUMAN RESOURCES

4.1. Protection of human resources

The Group recognizes, protects and promotes the value of human resources as a fundamental and irreplaceable factor in its success and in the development of its know-how/expertise.

With this in mind, the Group is committed to creating, maintaining and protecting the conditions that will allow each Employee's abilities, skills, and knowledge to further grow, so as to ensure the effective achievement of corporate objectives.

The Group attaches great importance to the physical wellbeing and moral probity of its employees, ensuring working conditions that respect the dignity of the individual and guaranteeing safe and healthy work environments. Requests or threats made with the aim of inducing people to breach current laws, this Code of Ethics and/or individual beliefs or preferences will not be tolerated.

Moreover, forms of conditioning that may in any way influence statements made to judicial authorities will not be tolerated.

All employees must be treated in strict compliance with the principles and values set out in this section, in a climate that fosters communication and cooperation, both between them and with their superiors, as well as fairness and mutual respect.

The Group pursues a policy aimed at recognizing merit while respecting equal opportunities, without discriminating on the basis of gender, race or ethnicity, nationality, age, political opinions, union membership, religious beliefs, health status, sexual orientation, or economic and social conditions.

Employees' dedication and professionalism are crucial elements in achieving corporate objectives. For this reason, the Group is committed to developing the skills, abilities and talents of each employee by following a policy of merit and equal opportunities.

Each employee should aim to create a work environment that is always stimulating and rewarding, and thus fosters the development of each person's potential.

4.2. Gender equality

The Group adopts gender policies to ensure that all employees have access to the same career and development opportunities, regardless of gender, and is committed to eliminating all forms of discrimination, creating a fair and respectful work environment.

The Group recognizes the value of people and their "specificities", adopting an inclusive approach to HR management which ensures that all people in the Company have the same opportunities for professional growth and development, regardless of gender.

It therefore ascribes value to the diversity present, certain that the uniqueness of each individual contributes substantially to the evolution of the Company and the creation of business opportunities.

To this end, the Group is committed to creating a work environment that is free from prejudice, free from all forms of intimidation, and respects the dignity of the individual.

4.3. Harassment in the workplace

The Group is committed to providing a safe, respectful and inclusive workplace where all employees are treated with dignity and respect; no behavior liable to create an intimidating, offensive or humiliating environment, engaged in for personal or professional reasons by any employee or collaborator toward any other employee or collaborator, will be tolerated.

Such behaviors include, but are not limited to:

- interfering with the job prospects of other individuals, simply for reasons of competitiveness (one's own or that of other employees);
- making decisions that will affect someone else's work life conditional upon their acceptance of sexual favors, or taking decisions based on personal and cultural diversity;
- behaving in a way that is manipulative, intimidating or designed to isolate someone, devalue them or undermine their confidence;
- spreading harmful rumors or private information for the purpose of discrediting someone;
- making sexually explicit, offensive, or discriminatory comments based on gender, race, ethnicity, sexual orientation, or religion;
- using the influence of one's position to obtain sexual favors from collaborators.

4.4. Staff recruitment and remuneration

The selection, grading and career path of company personnel are determined exclusively, and without discrimination, on the basis of objective consideration of the professional and personal qualities necessary for the work in question and the abilities/skills demonstrated in the performance of the same.

The employment relationship complies with the industry's collective bargaining regulations and social security, tax and insurance regulations.

All personnel are employed under regular work contracts. No form of illegal or child labor or labor exploitation is tolerated.

Subject to compliance with mandatory regulations, the system of remuneration, at any level, whether in the form of cash or benefits, must respect the principle that remuneration is decided solely on the basis of assessment of training, specific professionalism, experience acquired, demonstrated merit, and achievement of assigned objectives.

Even the mere suggestion of increases in remuneration, or of other benefits or career advancement, in return for activities that do not comply with the law, with this Code or with internal rules and regulations, is also prohibited, at all levels of hierarchy.

4.5. Alcohol, drugs and smoking

The Group requires each Addressee to contribute to ensuring the maintenance of an environment characterized by decorum and sobriety.

The use of drugs or any substance capable of altering an individual's mental and physical state is prohibited.

Smoking is also prohibited in the workplace, except in designated areas, and anyone exposed to secondhand smoke in the workplace is required to inform their superior.

4.6. Use of corporate assets

Corporate assets, except those the Group expressly assigns to employees as benefits, may not be used for personal reasons and interests.

Under no circumstances is it permitted to use corporate assets, particularly IT and network resources, for personal purposes or for purposes contrary to law, public order or accepted morals, or to commit or encourage crimes or racial intolerance, glorification of violence or violation of human rights.

Addressees are personally responsible for keeping IT tools safe and secure, avoiding fraudulent or improper use of them and avoiding any transfer, even to colleagues, of their access privileges. In addition, Addressees must comply with the provisions set out in internal regulations issued in the field of cybersecurity.

Use of corporate assets must be exclusively for the purpose of carrying out corporate activities or for purposes authorized by the heads of the corporate departments concerned: it is expressly forbidden to use company IT resources for consultation, access or, in general, for any activity involving sites with child pornography content.

No Addressee is permitted to make audiovisual, electronic, paper or photographic recordings or reproductions of company documents, except in cases where such activities are part of their normal work.

It is expressly forbidden to engage in conduct that may in any way damage, alter, impair or destroy IT or telematic systems, computer programs and data, of the Group or of third parties.

5. RELATIONS WITH THIRD PARTIES

5.1. Donations, gifts and sponsorships

Gifts of modest value made within the framework of normal courteous relations are permitted.

The aforementioned gifts, however, must be such that they cannot be construed, by the other party - i.e., an unrelated and impartial third party - as gifts given with the aim of achieving the acquisition or granting of undue advantages, or as illegal or immoral. In any case, such gifts must always be adequately reported.

In any case, the Addressee is forbidden from requesting that gifts of any kind be offered or granted (i.e., accepted or received), even if they are of modest value.

An employee receiving gifts and preferential treatment outside the framework of normal courteous relations must inform their department head.

Any Addressee who, within the scope of their duties, stipulates contracts with third parties must ensure that such contracts do not provide for or involve donations in breach of this Code.

Companies in the Group may make contributions and provide sponsorships to support initiatives proposed by legally established public and private entities and nonprofit associations.

Sponsorships and contributions may concern events and initiatives of a social, cultural or artistic nature. They may also be aimed at the realization of initiatives, research and conferences dealing with issues of interest to the Group.

5.2. Relations with public authorities

Only specifically appointed departments and persons may, in the name and on behalf of the Company, have dealings with public authorities, in compliance with the provisions of this Code.

The following are examples of conduct that, whether in Italy or abroad, is prohibited:

- promising, offering, or in any way paying/providing sums, goods in kind, or other benefits (with the exception of gifts or benefits of modest value that are part of normal business practice) in a personal capacity, even under illicit pressure, to public officials or private parties in charge of public services, with the aim of promoting or favoring the interests of the Group. Moreover, these provisions cannot be circumvented by resorting to different forms of aid or contribution, such as appointments, consultancies, advertising, sponsorships, employment opportunities, business opportunities or opportunities any other kind etc;

- behaving or acting in the above way toward spouses, relatives or in-laws of the persons mentioned above;
 - engaging in any other conduct intended to improperly influence the decisions of officials who are negotiating or making decisions on behalf of public authorities;
 - providing or promising to provide, request or obtain information and/or documents that are confidential or otherwise likely to compromise the integrity or reputation of either or both parties, in violation of the principles of transparency and professional fairness;
 - having a consultant or "third party" represent the company when this may give rise to conflicts of interest; in any case such third parties, and their personnel, are subject to the same provisions that bind Addressees.

The behaviors mentioned above are prohibited both during and after business negotiations with, submission of requests to or relations with public authorities, if directed at officials who negotiated or made decisions on behalf of these authorities.

Addressees must ensure that statements and disclosures made to public officials are accurate and true.

Each Company, in selecting independent third parties such as agents, distributors, partners, suppliers, consultants, collaborators and all others who operate, in Italy or abroad, in the name and on behalf of the Company, must verify their reliability and integrity, also to ensure compliance with the principles set out in this Code.

5.3. Relations with third parties

FI.MO.TEC. aims to establish and maintain business relations only with suppliers who offer the highest guarantees of fair and ethical conduct.

In line with this principle, the Group requires its suppliers, under contract, to respect the law and also to note and comply with the principles enshrined in this Code.

Suppliers of goods or services are selected, and goods and services of any kind are purchased, by specially designated departments, on the basis of objective and traceable criteria of seriousness, quality, efficiency and cost-effectiveness.

In its relations with suppliers, the Group is guided by the principles of transparency, equality, fairness, and fair competition.

Specifically, within the scope of these relationships, Addressees are required to:

- operate within the framework of current laws and regulations and observe any internal rules and/or practices on the selection of suppliers and management of supplier relations;
- establish efficient, transparent and cooperative relationships by maintaining an open and frank dialogue in line with the best business practices;
- obtain the cooperation of suppliers in consistently ensuring the best possible balance of quality, cost and delivery schedule;
- demand application of the contractually agreed conditions;
- require suppliers to abide by the principles of this Code of Ethics and make specific provision for this in contracts.

In the case of suppliers of goods, the department concerned will ensure that goods received are in line with what was actually ordered.

External consultants are selected by specially designated departments. To this end, Addressees must observe the internal rules for the selection and management of relations with external consultants. The fee for external consultants must be closely aligned with the services indicated in the contract.

In developing relations with other partners through the stipulation of agency or procurement contracts, the establishment of new companies, and/or the signing of joint venture agreements and the like, Addressees must adhere to the principles of this Code of Ethics by identifying, as potential partners or associates, reputable individuals who are engaged only in lawful activities and are guided by ethical principles similar to those enshrined in this Code.

The Group recommends that its suppliers, consultants and partners refrain from making gifts of any kind that go beyond common courtesy.

5.4. Customer relations

The Group's success is based above all on its ability to meet the needs of its customers while maintaining consistently high standards of quality, performance and reliability. Addressees must contribute to this approach by identifying customers' needs and striving to meet their expectations, making the best use of company resources.

In its relations with customers, the Group is guided by the principles of transparency, equality, loyalty and fair competition. The Company guarantees fairness and clarity in its business negotiations and assumption of contractual obligations, as well as diligent fulfilment of the same.

Specifically, in dealing with customers, all Addressees are required to:

- operate within the framework of current laws and regulations and comply with any internal rules and/or practices on the handling of customer relations;
- avoid arbitrarily discriminating against customers, or seeking to unduly exploit positions of strength against customers;
- meet their obligations to customers;
- provide accurate, complete and truthful information.

In initiating business relations and in managing those already in place, Addressees must avoid engaging with parties involved in illegal activities or, in any case, lacking the necessary requirements in terms of ethical conduct and commercial reliability. Addressees must verify and constantly monitor such reliability with the utmost diligence.

5.5. Relations with political organizations and trade unions

Relations with political parties, trade unions and other stakeholder associations must be conducted in compliance with the rules of this Code, showing particular regard for the principles of impartiality and independence.

Membership, in the name of the Group, and the payment, on its behalf, of any subscriptions to associations of any kind must be properly authorized by the Board of Directors in compliance with any internal rules and/or practices in force at the time, and may only concern organizations whose aims and objectives are in line with the Group's economic and industrial policy and ethical and behavioral values.

5.6. Relations with the media

Information concerning the Group and aimed at the mass media may only be disclosed by the designated corporate departments, in compliance with any internal rules on individual matters in place at the time; Addressees, if asked to provide information or give interviews, must first notify the designated department and receive specific authorization from it.

In any case, data or information communicated externally must be truthful, transparent and complete, and thus consistent with the image and strategies adopted by the Group, thereby fostering public support for corporate policies.

6. ACCOUNTING DATA

6.1. General principles

All Addressees, within the sphere of their own capacities and responsibilities, must ensure the utmost truthfulness, transparency and completeness of the information produced in the course of their work. In particular, each Addressee involved in compiling the data contained in financial statements, company reports, and all corporate communications must adhere to these principles and diligently verify the accuracy of the said data.

All accounting records employed to prepare the financial statements must be kept clearly, truthfully and correctly, and carefully stored by the corporate entities/figures responsible for bookkeeping. The statutory financial statements must be prepared clearly and in accordance with the law, and must give a true and fair view of the Company's financial position and the economic result of the financial year.

6.2. Financial resources

The FIMO Group is committed to ensuring that all operations and transactions are authorized, verified, legitimate, consistent and appropriate, in order to ensure, in turn, that they are properly recorded, traceable, and that the associated decision-making, authorization and implementation procedures can be verified.

The procurement and disbursement of financial resources, as well as their administration and supervision, must at all times comply with local and international regulations, as well as with the internal rules and/or approval and authorization practices envisaged.

6.3. Bookkeeping

Each accounting entry must reflect exactly what is described in the supporting documentation, which must be complete and auditable.

Bookkeeping is based on generally accepted accounting principles and entails the systematic recording of events associated with corporate management. The administration department must keep adequate supporting documentation for each accounting entry corresponding to a corporate transaction. Adequate documentation in support of each transaction is necessary to facilitate bookkeeping, the traceability of operations, and the identification of any liabilities.

Such documentation must make it possible to identify the reason for the recorded transaction and track its authorization process. Supporting documentation must be readily available and filed according to appropriate criteria that allow easy consultation by both internal and external auditors.

Addressees are required to cooperate in proper and timely recording of all management activities in the books, and to ensure that business transactions are logged promptly and correctly, allowing the administrative-bookkeeping system to fulfil its purposes.

Addressees, if they become aware of omissions, falsifications, or inaccuracies in accounting records or statements made for tax purposes, or in documents linked to the same, are required to promptly inform their department head.

6.4. Fiscal management

The Group's approach is based on maximum transparency and cooperation in its dealings with the tax authorities, as well as compliance with tax regulations and with the requirements, obligations and deadlines set by the said authorities. The Company condemns operations undertaken for the purpose of circumventing tax regulations.

The Group undertakes to ensure that major changes to tax regulations are promptly communicated to the relevant personnel, who will be instructed on the main legal, accounting and tax concepts and issues that may affect tax obligations.

6.5. Relations with supervisory bodies

The Group, in its dealings with supervisory bodies, shows the utmost diligence, professionalism, transparency, cooperation and helpfulness. It fully respects their institutional role, and therefore complies in a timely and precise manner with their provisions and with any requirements.

Data and documents are made available efficiently, and are drafted using clear, objective and exhaustive language in order to provide accurate, complete, faithful and truthful information. Conflicts of interest must be avoided, or in any case reported in the appropriate form and manner.

6.6. Anti-money laundering

The Group conducts its business in full compliance with current anti-money laundering regulations and with the provisions issued by the competent authorities. To this end, it undertakes to avoid involvement in transactions of dubious fairness and transparency.

Particular attention must be paid to relationships involving the receipt or transfer of sums of money or other valuables: each company, in order to avoid the risk of carrying out, even unintentionally or unwittingly, transactions of any kind involving money, goods or other valuables originating from criminal activity, shall refrain from receiving, for any reason, payments made in cash, in bearer securities, or through unauthorized intermediaries or the interposition of third parties, such that it becomes impossible to identify the paying party; similarly, each Company shall refrain from engaging with parties based or operating in countries that do not guarantee corporate transparency and, more generally, from carrying out transactions in ways that preclude the tracking of financial flows.

Addressees are required to promptly report to their department head any dealings with third parties that do not comply with the provisions of this paragraph.

Addressees are therefore required:

- to verify in advance available information on business counterparts, suppliers, partners, agents, distributors, collaborators and consultants in order to ascertain their respectability and the legitimacy of their activities before establishing business relations with them;
- to avoid any involvement in operations that could, even potentially, facilitate the laundering of money coming from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering regulations and any internal rules and/or supervisory practices;
- not to make payments to any party other than their contractual counterparty, or in any country that is not the country of the parties and/or of the enactment of the contract.

7. WORKPLACE SAFETY AND THE ENVIRONMENT

7.1. Workplace safety

The Group aims to maintain the highest levels of health and safety and to ensure that all necessary measures to prevent occupational injuries and illnesses are in place.

All employees must help to keep their work environment healthy and safe.

The basic principles and criteria of prevention that provide the basis for occupational health and safety decisions of all kinds and at all levels, are the following:

- avoid risks;
- assess unavoidable risks;
- minimize risks on the basis of knowledge gained from technical progress;
- address risks at source;
- apply ergonomic principles in the organization of work and adapt the work to human needs, especially when designing and choosing equipment and defining work and production methods, and particularly with the aims of alleviating monotonous work and repetitive work and of reducing the health impact of such work;
- take technological progress into account when adapting machines, equipment and any other devices used;
- replace of anything dangerous with non-dangerous or less dangerous alternatives;
- provide workers with personal preventive and protective equipment that is appropriate for the risks to be prevented and the working conditions, and meets worker needs and requirements;
- plan prevention, aiming at a coherent overall approach that takes into account technique, work organization, working conditions, social relations and the impact of factors specific to the work environment;
- prioritize collective over individual preventive measures;
- give workers adequate instructions;

- guarantee health monitoring of workers;
- attend consultations and periodic meetings on occupational health and safety protection;
- provide appropriate and adequate information, education and training for workers and managers. Specific education and training must take place when the employment relationship is entered into or, in procurement situations, at the start of the work, as well as whenever duties are transferred or changed, and whenever new work equipment, new technologies, or new hazardous substances or preparations are introduced. Training must be delivered in the workplace by an individual with the necessary expertise. Training of workers and worker representatives must be repeated periodically as risks evolve or new ones emerge. The content of the training must be readily understandable by workers and must provide them with the necessary knowledge of and skills in the field of occupational health and safety;
- plan measures deemed opportune to ensure the improvement of safety levels over time, including through the adoption of best practices;
- plan measures to be adopted in emergencies and situations of serious and immediate danger (first aid, fire-fighting, worker evacuation etc.);
- use warning and safety notices.

Every corporate and individual activity, both at management level, where decisions are made, and at operational levels, where they are implemented, must be guided by the need to respect these principles.

In addition, workers are required to:

- use machinery and equipment, personal protective equipment, and safety devices properly;
- report any work situation involving serious and immediate danger, as well as any fault in safety systems;
- help make sure that health protection requirements are met so that the employer can, in turn, ensure that the working environment and conditions are safe and hazard-free;
- contribute, together with the employer, managers and supervisors, to the meeting of obligations established to protect health and safety in the workplace.

The Group shall ensure that contractors receive information on the specific risks existing in the work environment and cooperate with them in the implementation of risk prevention and protection measures related to sub-contracted activities.

7.2. The environment

The Group considers respect for the environment to be a fundamental value, and is therefore committed to operating in compliance with current regulations, applying the best available technologies.

The basic principles and criteria of prevention that provide the basis for environmental protection decisions, of all kinds and at all levels, are the following:

- address risks at source;
- minimize risks on the basis of knowledge gained from technical progress;
- take into account the latest technological advances;
- provide workers with appropriate and adequate information and training;
- plan measures deemed appropriate to ensure the improvement of environmental protection levels over time;
- plan the maintenance of equipment and facilities in order to eliminate or reduce pollution.

To this end, the Group undertakes to:

- implement appropriate environmental management systems to ensure prevention of environmental risks;
- define specific objectives and improvement programs, aimed at minimizing significant environmental impacts;
- provide institutions with all the information they need to understand any environmental risks associated with corporate operations;
- develop, where necessary, specific contingency plans.

The Group also encourages its collaborators, suppliers and partners to adhere to the principles on environmental protection set out in this Code of Ethics, urging, where necessary, the adoption of appropriate preventive measures in order to align them with the Group's environmental policy.

8. IMPLEMENTATION OF THE CODE OF ETHICS

8.1. Adoption and dissemination of the Code of Ethics

This Code of Ethics and its updates are defined and approved by the Board of Directors of FI.MO.TEC. S.p.A.

The Code, also in electronic format, is distributed to all resources as a special communication by the Group's HR department and is published on the Group's website.

Any amendments to the Code shall be published and made available in the manner described above.

This Code takes effect from the date of its approval by the Board of Directors.

8.2. Breaches of the Code of Ethics

In order to ensure effective implementation of this Code and to enable the reporting of any breaches that come to its attention within its work environment, the Group has implemented specific reporting channels, in line with the provisions of Directive (EU) 1937/2019 on "*The protection of persons who report breaches of Union law*" and with the relevant local implementation laws.

Reports, whether written or oral, can be submitted using an IT platform that guarantees, also through the use of encryption tools, the anonymity of the person reporting the breach, and ensures that the content of the report and related documentation remains confidential; the platform can be accessed at the following link:

<https://wb.fimoworld.com/#/>

Whistleblower protection measures are applied in accordance with current regulations.

The Group guarantees protection of the whistleblower against any form of retaliation and/or discrimination. In accordance with current regulations, this protection extends to all parties broadly connected with the reporting person or the reporting person's organization.

8.3. Penalties

In accordance with applicable local regulations, compliance with the rules contained in this Code must be considered an essential part of the contractual obligations of Group employees and of agents, distributors, partners, consultants, collaborators, suppliers and all those who operate in the name and on behalf of the Group's companies, and of those who become "Addressees" of this Code, with reference to current contractual relationships.

Each Company, through specially appointed bodies and departments, shall ensure that penalties, proportionate to the respective breaches of the Code and in accordance with current provisions regulating labor relations, are imposed consistently, impartially and fairly.

Employee penalties are in line with the measures set out in applicable labor contracts. Breaches are sanctioned by the relevant bodies according to internal corporate rules and as expressly provided for in the relevant contractual clauses.

