



**METALTECNICA**

# Code of conduct

*Rev. 0 del 16/02/2024*

# Code of conduct

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## 1. INTRODUCTION

This Code of conduct was adopted by Metaltecnica s.r.l., in order to clearly define the ethical principles which inspire the Company itself, and the standards of behaviour required in conducting business.

The Company bases its activity on compliance with the law and ethical principles in the belief that compliance with legislation and ethics in conducting business are also a condition for the success of the Company.

The value and importance of the Code of conduct are strengthened by the provision of a specification responsibility of the Entities, as a consequence of the commission of crimes and administrative offences relevant for the purposes of Legislative Decree 8 June 2001, n. 231 (hereinafter also "Legislative Decree. 231/2001" or the "Decree").

## 2. RECIPIENTS

The Directors, the Auditors, the Employees, the Consultants, the Collaborators, the Suppliers, the Customers and all those who they operate, both on the national territory and in foreign countries, in the name and on behalf of the Company (the "Recipients") are required to comply with the provisions of this Code.

The principles and provisions contained therein constitute exemplary specifications of the obligations' general principles of diligence, correctness and loyalty which qualify the fulfilment of work performance and the behaviour that the Employee or Collaborator is required to observe.

Compliance with the provisions of the Code of conduct constitutes an integral part of the contractual obligations of Employees, also pursuant to and for the purposes of art. 2104 cod. civil (1), while their violation by the Recipients constitutes, depending on the case, a disciplinary offense (sanctioned in compliance with the applicable legislation) and/or a contractual breach and may lead to compensation for any damages resulting from such violation towards of society.

The Company requires Suppliers and Collaborators to comply with the ethical principles set out in this Code, by virtue of specific contractual clauses.

## 3. FUNDAMENTAL PRINCIPLES

### 3.1. COMPLIANCE WITH THE LAWS

Compliance with the laws and regulations in force in Italy and in all the countries in which the Company operates represents a fundamental principle: within the scope of their functions and in the exercise of their respective activities, the Recipients are required to observe and respect the rules of the legal system (national, supranational or foreign) in which they operate and must in any case abstain from committing violations of laws and regulations.

Each Recipient must diligently acquire the necessary knowledge of the laws and regulations applicable to the performance of one's functions, as in force at the time: conducts in conflict with the aforementioned precepts are not tolerated, nor can the lack of adequate knowledge of the same be justified in any way.

Each employee and collaborator observes, in addition to the general principles of diligence and loyalty referred to in art. 2104 cod. civ., also the behavioural prescriptions contained in the collective agreements applicable to it.

### 3.2. DIGNITY AND EQUALITY

The Recipients of this Code must recognize and respect the personal dignity, privacy and personality rights of any individual. The Recipients work with colleagues of any nationality, culture, religion, race, political idea, political orientation, sexual orientation and social class. Discrimination of any kind is not tolerated.

### 3.3. INTEGRITY

In carrying out their functions, the Recipients maintain a conduct inspired by transparency and moral integrity, considering the various social, economic, political and cultural contexts of reference and, in particular, the values of honesty, correctness and good faith.

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The Company recognizes freedom of competition as crucial, in absolute compliance with the fundamental principles set out in this Code, forms of coercion of any kind against competing companies are not tolerated.

### **3.4. TRACEABILITY**

Each Recipient must keep adequate documentation of each operation carried out, in order to allow a control regarding the reasons underlying each choice and the characteristics of the operation itself, both in the authorization phase and in the execution, registration and verification phase.

### **3.5. PROFESSIONALISM AND SPIRIT OF COLLABORATION**

The conduct of each Recipient significantly determines the quality, efficiency of the company organization and the reputation of Metaltecnica s.r.l.

Each Recipient carries out his/her activity with the professionalism required by the nature of the tasks and functions performed, using maximum effort to achieve the objectives assigned to him/her and assuming the responsibilities that fall to him/her due to his/her duties.

Each Recipient diligently carries out the necessary in-depth and updating activities.

Mutual collaboration between the subjects involved, in any capacity, in the same project or production process represents an essential principle for the Company.

### **3.6. CONFIDENTIALITY OF SENSITIVE DATA**

The Recipients must ensure the confidentiality of the information and data acquired during the exercise of work activity.

The use of confidential data for purposes other than those for which they were communicated is absolutely prohibited, except in the case of express authorization and, in any case, always in the most rigorous observance of current legislation on privacy and internal company rules.

The protection of information and data contained or archived in IT media must be ensured by the adoption of security measures suitable for the purpose.

The data and information acquired are processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected.

### **3.7. PROTECTION OF TRADEMARKS, PATENTS AND INTELLIGENT WORKS**

The Company expressly prohibits any conduct aimed at the alteration, counterfeiting, as well as the use of trademarks or distinctive signs, national or foreign designs and models, software applications, etc.

It also stigmatizes any conduct aimed at introducing into the territory of the Italian State and other States which operates industrial products with altered or counterfeited trademarks or other distinctive signs, as well as the marketing of products with trademarks or distinctive signs that are misleading as to the origin, provenance or quality of the product.

Likewise, the Company does not tolerate manufacturing, marketing, dissemination or simple use of objects and goods created by usurping or violating industrial property rights.

The protection of intellectual works is considered of primary importance and therefore any abusive diffusion, reproduction, use, sale for any purpose, for any use and with any instrument is prohibited.

## **4. COMMUNICATIONS**

### **4.1. OUTSIDE COMMUNICATIONS**

External information must be truthful, clear and transparent.

Relations with the mass media are reserved exclusively for the responsibilities and company functions delegated to this. Recipients are expressly prohibited from providing information to the mass media, social networks or from undertaking to provide it without the authorization of the competent company function.

Recipients cannot offer payments, donations or other donations aimed at influencing the professional activity of mass media, influencers or public figures.

The Recipients are called upon to provide external information regarding objectives, activities, company results, via participation in public speeches, conferences, congresses, seminars or the writing

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of articles, essays and publications in general, are required to obtain authorization from the top management of the organizational structure to which they belong regarding the texts, the reports prepared and the lines of communication, agreeing and verifying the contents with the competent company function.

### 4.2. CIRCULATION OF INFORMATION

All information obtained by the Recipients during the course of their work is the property of Metaltecnica s.r.l..

In carrying out its activity, the Company ensures the transparency of the choices made. The circulation of information must be managed according to criteria of truth, accuracy and timeliness. To this end, information reports, intended both internally and for external relations (Suppliers, Customers, institutional interlocutors) must be drawn up scrupulously and in compliance with these principles.

The Company fulfils its legal obligations, including those regarding communications to the competent authorities, with particular reference to the supervisory and control authorities. The Company collaborates in carrying out their functions, in compliance with current legislation.

## 5. EXTERNAL RELATIONSHIPS

### 5.1. DONATIONS, BENEFITS OR OTHER UTILITIES

Recipients are prohibited from offering, providing, promising or granting to third parties as well as accepting or receive from third parties, directly or indirectly, even on festive occasions, donations, benefits or other benefits and also in the form of sums of money, goods or services.

Only donations of modest value directly attributable to normal courtesy of commercial relations are permitted ~~commercial~~. The aforementioned donations, however, must be such that they cannot generate, in the other party or in an extraneous and impartial third party, the impression that they are aimed at acquiring or granting undue advantages, or such as to generate the impression of illegality or immorality.

In any case, such donations must always be adequately documented.

The Recipient who receives donations, or offers of donations, that do not comply with the foregoing must immediately inform the Supervisory Body appointed pursuant to Legislative Decree 231/2001, for the adoption of appropriate measures.

In any case, the Recipient is prohibited from soliciting the offer or concession, or acceptance or receipt of donations of any kind, even if of modest value.

Any Recipient who, as part of their duties, stipulates contracts with third parties must be vigilant so that such contracts do not provide for or imply donations in violation of this Code.

### 5.2. RELATIONSHIPS WITH CONTRACTUAL COUNTERPARTIES

Relationships with contractual counterparties are held in compliance with the fundamental principles set out in this Code and the legal provisions applicable from time to time.

Activities towards contractual counterparties must be inspired by the principles of honesty, loyalty, availability and transparency, and must be supported by the criteria of competence, professionalism, dedication and efficiency.

### 5.3. RELATIONSHIPS WITH GOVERNMENTS, INSTITUTIONS AND PUBLIC OFFICES OR HAVING PUBLIC FUNCTIONS

Relationships with the Public Administration and with Public Institutions are maintained by the Managers expressly authorized to do so or by the people delegated by them, in compliance with the rules of this Code, paying particular attention to the principles of correctness, transparency and efficiency.

In particular, by way of example, the following behaviours undertaken both in Italy and abroad are prohibited:

- promise, offer or in any way pay or provide sums, goods in kind or other benefits (except whether they are gifts or utilities of modest value and in any case compliant with normal commercial practice), also as a result of illicit pressure, in a personal capacity on public officials or others private interlocutors, when they are in charge of a public service, with the aim of promoting or promote the interests of

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Metaltecnica s.r.l.. The aforementioned provisions cannot be circumvented by resorting to different forms of aid or contributions, such as assignments, consultancy, advertising, sponsorships, employment opportunities, commercial opportunities or any other kind, etc.;

- maintain and undertake such behaviours and actions towards spouses, relatives or in-laws of people described above;
- behave in any way intended to improperly influence the decisions of officials who deal or make decisions on behalf of the Public Administration;
- provide or promise to provide, solicit or obtain confidential information and/or reserved documents or likely to compromise the integrity or reputation of one or both parties, violating the principles of transparency and professional correctness;
- have the Company represented by a consultant or a "third party" when these can lead to conflicts of interest; in any case they, and their staff, are subject to the same requirements which bind the Recipients.

The behaviours described are prohibited both during business negotiations, requests or relationships with Public Administration both once these are concluded, if held against the officials who have negotiated or made decisions on behalf of the Public Administration.

**5.4. RELATIONSHIPS WITH POLITICAL PARTIES, TRADE UNIONS AND OTHER STAKEHOLDERS' ASSOCIATIONS**  
Relationships with political parties, trade unions and other interest-bearing associations are maintained by the authorized Company Representatives to do so, or by the persons delegated by them, in compliance with the provisions of this Code, having particular regard to the principles of impartiality and independence.

In relations with these categories, the behaviours and actions described in the previous paragraph are prohibited.

Strictly institutional forms of collaboration aimed at contributing to the realization of events or activities are permitted, such as the holding of conferences, seminars, studies, research, etc., provided it was not intended to obtain undue favours.

### 5.5. RELATIONSHIPS WITH SUPPLIERS OF GOODS AND SERVICES

The selection of goods' or services' suppliers and, in any case, the purchase of goods and services of any type are carried out by the specific functions delegated for this purpose, on the basis of objective and documentable criteria, based on the search for the best balance between economic advantage and quality of performance.

In relations with Suppliers, Metaltecnica s.r.l. is inspired by principles of transparency, equality, loyalty and free competition.

In particular, within the scope of these relationships the Recipients are required to:

- establish efficient, transparent and collaborative relationships, maintaining an open and frank dialogue in line with the best commercial practices;
- obtain the collaboration of the Suppliers in constantly ensuring the most convenient relationship between quality, cost and delivery times;
- demand the application of the contractually foreseen conditions;
- require Suppliers to comply with the principles of this Code of conduct and include in contracts specific forecast;
- operate within the scope of current legislation and request its prompt compliance.

### 5.6. RELATIONSHIPS WITH CUSTOMER

As in relations with Suppliers, also with customers Metaltecnica s.r.l. is inspired by principles of transparency, equality, loyalty and free competition. The Company considers it essential to maintain high quality standards of its products and services and maximize customer satisfaction.

### 5.7. RELATIONSHIPS WITH COLLABORATORS

In the context of relations with Collaborators, the Recipients are required to:

- carefully evaluate the opportunity to resort to the services of external collaborators and select counterparts with adequate professional qualifications and reputation;

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- establish efficient, transparent and collaborative relationships, maintaining an open and frank dialogue in line with the best commercial practices;
- obtain the cooperation of Collaborators in constantly ensuring the most convenient relationship between quality of service and cost;
- demand the application of the contractually foreseen conditions;
- require Collaborators to comply with the principles of this Code of conduct and include in contracts specific forecast;
- operate within the scope of current legislation and request its prompt compliance.

### 5.8. COMPETITION

Metaltecnica s.r.l. bases its operations on the strict observance of the laws (Italian and of the countries in which the Company operates), market rules and the guiding principles of fair competition. The Company is convinced that a correct and fair competition is a fundamental element for the development of the company and the market.

The Company and all its employees must abstain from unfair commercial practices and, in no way, the belief of acting for the benefit of Metaltecnica s.r.l. can justify the adoption of behaviours that conflict with these principles.

### 5.9. ORGANIZED CRIME OFFENSES

Metaltecnica s.r.l. refrains from having relationships of any nature, even indirect or through a third party, with subjects (natural or legal persons) who are known, or have reason to be suspected, to be part of or to carry out support activities in any form in favour of organizations criminal activities of any nature, including those of a mafia nature, those dedicated to the trafficking of human beings or the exploitation of child labour, as well as individuals or groups that operate for the purposes of terrorism, such conduct being considered to be behaviours that may cause serious damage to a country or to an international organization, carried out with the aim of intimidating the population or forcing public authorities or an international organization to carry out or refrain from carrying out any act or to destabilize or destroy the fundamental political, constitutional, economic and social structures of a country or international organization.

## 6. HUMAN RESOURCES

### 6.1. GENERAL PRINCIPLES

All the Company's staff are hired with a regular employment contract and the relationship is carried out in full compliance with the collective contractual legislation of the sector to which they belong, the tax, social security and insurance legislation, as well as the provisions on immigration.

The loyalty, ability, professionalism, seriousness, preparation and dedication of the staff represent crucial values and conditions for achieving the objectives of Metaltecnica s.r.l..

The Recipients must also expressly and constantly take into consideration respect for the person, his dignity and values, avoiding any discrimination based on sex, racial and ethnic origin, nationality, age, political opinions, religious beliefs, state of health, sexual orientation, economic-social conditions.

As part of the selection - conducted in compliance with the principles set out in this Code of conduct, internal procedures, equal opportunities and without any discrimination - Metaltecnica s.r.l. works to ensure that the resources acquired correspond to the profiles actually necessary for company needs, avoiding favoritism and benefits of any kind.

Any act of retaliation against Recipients who refuse to engage in illicit conduct or who complain or report such conduct is prohibited. In the field of human resources development, Metaltecnica s.r.l. undertakes to create and maintain the necessary conditions so that the abilities, skills and knowledge of each employee can further expand, in order to ensure the effective achievement of company objectives. For this reason, the Company pursues a policy aimed at recognizing merit, respecting equal opportunities.

In this context, the employee is required to cultivate and encourage the acquisition of new skills, abilities and knowledge, as well as to operate, in carrying out his/her activities, in full compliance with the organizational structures, also in order to allow correct and orderly activation of the chain of internal controls and the formation of a precise and detailed framework of responsibilities.



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### 6.2. REMUNERATION

Without prejudice to compliance with mandatory rules, the remuneration system, at any level, both in cash and through benefits, must be inspired by the principle that remuneration is determined solely on the basis of evaluations relating to training, specific professionalism, acquired experience, demonstrated merit and achievement of assigned goals.

The mere suggestion of increase in remuneration, other advantages or career progression, as compensation for activities that differ from the laws, this Code and the internal norms and rules are prohibited even if limited to competence.

### 6.3. COLLATERAL ACTIVITIES

Carrying out work activities, even occasional or free, outside of Metaltecnica s.r.l. is permitted to the Recipients provided that this does not hinder the fulfilment of their duties towards the Company and provided that such activities do not prejudice its interests or reputation.

For employed workers, apply, in this regard, the provisions contained in the national collective agreement for the sector, and the prohibitions on activities therein contained ~~therein apply~~.

### 6.4. WORK ENVIRONMENT

Within the work environment, the Recipients maintain a conduct characterized by seriousness, order and decorum. Episodes of harassment or intolerance towards anyone in the workplace are not tolerated.

The Recipients collaborate mutually in order to achieve common results and are committed to creating a peaceful and rewarding working environment.

### 6.5. COMPANY EQUIPMENT AND STRUCTURES

The Company's corporate assets and, in particular, the systems and equipment located in the workplace, are used for service reasons, in accordance with current legislation.

Under no circumstances is it permitted to use company assets and, in particular, IT and network resources for personal purposes and for purposes contrary to mandatory provisions of law, public order or morality, as well as to commit or induce the commission of crimes or in any case to racial intolerance, the glorification of violence or the violation of human rights.

No Recipient is permitted to make audiovisual, electronic, paper or photographic recordings or reproductions of company documents, except in cases where such activities fall within the normal performance of the functions entrusted to him.

It is expressly forbidden to engage in conduct that in any way could damage, alter, deteriorate or destroy IT or telematic systems, programs and IT data of the Company or of third parties.

Each Employee is personally responsible for maintaining the security of the aforementioned company assets, avoiding fraudulent or improper use of the same as well as the transfer, even to colleagues, of their user IDs and access passwords.

The use of the goods must be exclusively functional to the performance of company activities or to purposes authorized by the managers of the company functions involved: it is expressly forbidden to use company IT resources for consultation, access and, in general, for any activity that concerns sites with child pornography content.

### 6.6. ALCOHOLIC SUBSTANCES AND DRUGS, SMOKING

The use of drugs as well as the abuse of alcohol in the workplace is prohibited. Smoking is prohibited in the workplace: each Recipient is required to inform the Supervisory Body appointed pursuant to Legislative Decree 231/2001 or their Manager in the event that they are forced to suffer passive smoking in the workplace.

### 6.7. TRAINING

Metaltecnica s.r.l. will provide its employees and collaborators with adequate training on the administrative responsibility of institutions, health and safety. Collaborators are required to participate in courses, meetings and training programs organized by the Company and aimed, among other things, at recognizing potentially risky activities connected to the crimes covered by the Decree itself.

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### **6.8. INTERNAL CONTROL**

By internal control system we mean the set of tools and processes necessary or useful to direct, manage and verify the Company's activities.

Metaltecnica s.r.l. provides for an internal control system, aimed at verifying and guiding the corporate organisation, as well as ensuring the application of legal and regulatory provisions.

## **7. RELATIONS WITH TRADE UNIONS AND AUDITORS AND ANTI-MONEY LAUNDERING**

### **7.1. RELATIONSHIPS WITH TRADE UNIONS AND AUDITORS**

The Company guarantees that relations with trade unions and Auditors are based on the utmost professionalism, diligence, transparency, collaboration, availability and in full respect of their institutional role, promptly executing the requirements and obligations required.

The data and documents are made available precisely and in clear, objective and exhaustive language in order to provide accurate, complete, faithful and truthful information, avoiding and in any case reporting, in the appropriate form and manner, situations of conflict of interest.

### **7.2. ANTI-MONEY LAUNDERING**

Metaltecnica s.r.l. carries out its activity in full compliance with current anti-money laundering legislation and with provisions issued by the competent authorities, undertaking to refuse to carry out suspicious operations in terms of correctness and transparency, under the specific control of the established function of Anti-money laundering.

Particular attention must be paid to relationships that involve the receipt or transfer of sums of money or other benefits: the Company, in order to prevent the risk of carrying out, even in an involuntary or unaware way, operations of any nature involving money, goods or other benefits which are the result of the commission of crimes, abstains from receiving payments of any kind in cash, bearer securities or through non-authorized intermediaries or through 'interposition of third parties in such a way as to make it impossible to identify the lending entity, that is having relationships with entities based or operating in countries that do not guarantee corporate transparency and, more generally, from carrying out operations such as to prevent the reconstruction of the cash flow.

The Recipients are therefore required:

- to verify in advance the information available on commercial counterparties, Suppliers, Collaborators and Consultants, in order to ascertain their respectability and the legitimacy of their activity before establishing business relationships with these people;
- to avoid any implication in suitable operations, even potentially, to encourage the laundering of money deriving from illicit or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation and internal control procedures.

## **8. SAFETY AND HEALTH**

### **8.1. GENERAL PRINCIPLES**

The Company is particularly sensitive to issues relating to the prevention of accidents and the protection of the workers' safety and health in the workplace.

The Company guarantees a working environment that complies with current health and safety regulations, through the monitoring, management and prevention of risks associated with carrying out work activities.

### **8.2. ENVIRONMENTS AND TECHNICAL SAFETY**

Environmental protection and safeguarding natural resources are among the main company objectives.

Through the commitment of Managers and Employees, the Company strives to conduct its activities in such a way as to protect the environment and continuously improve its environmental performance of environmental management implemented by the Company, guaranteeing compliance with the law and high compliance standards in this regard.

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At every stage, technical safety and health protection represent primary objectives and points basic references of the Company.

Each Employee must contribute, through their behavior, to the pursuit of these objectives.

### 8.3. COORDINATION OF REGULATORY COMPLIANCE

Metaltecnica s.r.l., in application of the regulations in force, implements and guarantees, also through the activity of the Supervisory Body, adequate coordination between the obligations imposed by the relevant legislation.

## 9. RULES FOR IMPLEMENTING THE CODE

### 9.1. ADOPTION AND DIFFUSION

The Code and its possible future updates are defined and approved by the Administrative Body, and posted with adequate prominence on the company noticeboard. A paper copy is distributed to staff and collaborators in current and future service and is in any case brought to the attention of all employees and collaborators in an accessible place, with the most appropriate methods.

### 9.2. SUPERVISORY BODY

The task of supervising the functioning and observance of this Code is entrusted to the single-carrying Supervisory Body (also "SB"), equipped with autonomous powers and designated within the organization.

In order to guarantee the effectiveness of this Code, Metaltecnica s.r.l. prepares information channels through which all those who become aware of any illicit conduct carried out within the Company can report to the Supervisory Body.

It is the obligation of each Recipient of this Code to report, without delays, any behaviour that does not comply with the principles of the Code of conduct implemented by each Recipient.

## 10. DISCIPLINARY MEASURES FOR VIOLATIONS OF THE CODE

### 10.1. VIOLATIONS OF THE CODE OF CONDUCT

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations envisaged for the employees of Metaltecnica s.r.l., pursuant to article 2104 of the Civil Code, as well as for the Consultants, Collaborators of the Company and for those who become Recipients of this Code, with reference to the existing contractual relationship.

### 10.2. SUPERVISORY AND REPORTING BODY

Any violation of the principles and provisions contained in this Code of conduct by the Recipients must be promptly reported to the Supervisory Body (Company Contact) and addressed to the following email address [risorseumane@metaltecnicazanolo.it](mailto:risorseumane@metaltecnicazanolo.it).

Following the reports received, the Supervisory Body (company contact person) will carry out the relevant investigations, possibly also making use of the competent company functions and will inform the parties responsible for the imposition of disciplinary sanctions.

All reports received by the Supervisory Body are handled in absolute confidentiality, under penalty of revocation of the mandate of the members of the same Body.

Reporters in good faith must be guaranteed against any form of retaliation, discrimination, penalization and in any case the confidentiality of the identity of the reporter will be ensured, without prejudice to legal obligations and the protection of the rights of the Company or of persons wrongly accused or in bad faith.

### 10.3. SANCTIONS

Metaltecnica s.r.l., through the bodies and functions specifically appointed for this purpose, provides for the imposition, with coherence, impartiality and uniformity, of sanctions proportionate to the respective violations of the Code and compliant with the current provisions regarding the regulation of employment relationships. The sanctions for Company employees are consistent with the measures indicated in the CCNL and are detailed in the same contracts.

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Infringements committed by Recipients who are not employees are promptly communicated in writing to the Supervisory Body by anyone who becomes aware of them.

Such infringements are sanctioned by the competent parties based on internal company rules and according to them, as expressly provided for in the relevant contractual clauses.

### 10.4. METHOD OF MODIFICATION AND ENTRY INTO FORCE

The Code is subject to revision, the revision activity takes into account the contributions received from employees and third parties, as well as regulatory developments and the most established international practices, as well as the experience acquired in the application of the Code itself.

Any changes to the Code introduced following this review activity are published and made available with the same disclosure methods indicated above.

This Code comes into force from the date of its approval, shown below.

Prato Sesia, li .....

Zanolo Piero.....

Zanolo Giovanni.....

Zanolo Marco.....

Zanolo Lisa.....