

ITALGESTRA S.R.L.

CODE OF ETHICS

Pursuant to Law decree N.231/2001

(approved by the Board of directors on March 28, 2023)

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THE CODE OF ETHICS OF ITALGESTRA S.R.L.

a. Introduction

The Code of Ethics is the fundamental charter of moral rights and duties that defines the ethical and social responsibility of each member of the company organization. It constitutes an effective means of preventing irresponsible or possibly unlawful behaviours by those who operate in the name of and on behalf of the company because it introduces a clear and explicit definition of the responsibilities of each company operator towards those who are involved directly or indirectly in the company's activities.

Its recipients are called to strictly and fully comply with the values and principles contained therein and are required to protect and preserve, through their own conduct, the respectability and image of Italgestra S.r.l. (the "Company"), as well as the integrity of its economic, social and human assets.

However, the Code of Ethics does not replace and does not prevail over the laws in force and the existing National Collective Labour Agreement, which retain their express and fundamental effectiveness and value.

b. Scope

Through the Code of Ethics, it is intended, in particular to:

- define and explain the general ethical values and principles that inform the company's business and its relations with customers, suppliers, partners, employees, collaborators, administrators, public institutions and any other subject involved in the company's activities;
- formalise the commitment to behave in respect of the ethical principles of moral legitimacy, equity and equality, protection of the person, diligence, transparency, honesty, confidentiality, impartiality and protection of health;
- indicate to its employees, collaborators and directors the principles of conduct, values and responsibilities which it requires them to comply with punctually during the performance of their work;
- define the implementation tools and methodology.

c. Recipients

The Code of Ethics is destined to:

- members of collegial body
- employees (both fixed-term and permanent);
- project collaborators;
- external and internal consultants;
- suppliers of goods and services;
- any other person who may act in the name of and on behalf of the company, whether directly or indirectly, permanently or temporarily, or those who establish relationships or relations with the company and work to pursue its objectives.

d. Circulation

The recipients of this Code of Ethics are required to learn its contents and comply with its precepts.

The Code of Ethics will be made available to them, as specified below.

The Management, or a delegate, of the company will be responsible for the effective implementation of the Code of Ethics and its circulation within and outside the company. An essential requirement of any profitable relationship with the company is the respect, by the other recipients, of the principles and provisions contained in this Code of Ethics. To this end, at the time of signing contracts or agreements with other recipients, the company provides its interlocutors with a copy of this document.

The company guarantees the accessibility of all information and documents to those entitled to them and provides, through the availability of its directors and employees, responsible for their function, all the information that favours the exercise of supervisory functions

e. Consequences in case of violation of the Code of Ethics

The Company has a long history of complying with the applicable regulations in each specific area of interest and has earned the credibility and appreciation of its customers. Unethical or unlawful conduct would result in the company's relationship of trust being damaged and would cause severe damage to its image, reputation and credibility. Employees and external collaborators are required to comply with this Code of Ethics in all respects. Observance of this Code of Ethics, therefore, constitutes an essential part of the contractual obligations of the Company's employees and collaborators, in accordance with articles 2104 and 2106 of the Civil Code. Violation of the provisions of this Code of Ethics by employees and collaborators constitutes a breach of contractual obligations and may result, depending on the case, in the application of sanctions and disciplinary measures provided for by the applicable Collective Agreements, termination of the relationship and compensation for damages. The Company will take appropriate action against those whose actions are found to be in violation of this Code of Ethics.

Disciplinary actions may include, at the Company's sole discretion, a verbal or written warning, suspension or immediate termination of employment or business, or any other disciplinary action deemed appropriate under the circumstances. Certain violations of this Code of Ethics may also be subject to civil or criminal prosecution by administrative or other authorities.

f. General ethical principles: professionalism, loyalty, honesty, correctness and transparency

Everyone performs his own job activity with diligence, efficiency and correctness, making the best use of the tools and time at their disposal and assuming the responsibilities related to compliance.

People are required to be loyal to the company and within the scope of their work, people in the company are required to know and diligently comply with Model 231 and the laws in force. Honesty represents the fundamental principle for all the company's activities, for its initiatives and constitutes an essential value of organizational management. Relations with stakeholders, at all levels, must be based on criteria and

behaviours of correctness, cooperation, loyalty and mutual respect. In no case may the pursuit of the company's interest justify dishonest conduct.

The organization is committed to complying with all national and international rules, laws, directives and regulations and all generally accepted practices. In addition, it inspires its decisions and behaviours to care for the public interest entrusted to it.

Individuals shall not use for personal purposes any information, property or equipment available to them in the performance of their assigned function or duties. Each person shall not accept or make for himself or herself or for others any pressure, recommendation or report that could be prejudicial to the Company or of undue advantage to himself or herself, to the Company or to third parties. Each person will not accept or make promises of improper offers of money or other benefits. The Company is committed to operating in a clear and transparent manner, without favouring any interest group or individual.

g. The values of the Company

Values are the guiding principles that we use to underpin decision-making, guide our conduct and define our culture.

By working together with these Values every day, we build a sustainable business that is more successful and a better place to work.

SAFETY

We care about people. We look after our own safety and help others to stay safe. Staying alert and anticipating danger, we report hazardous situations and prevent accidents before they occur. We are proactive and look after our own wellbeing

COLLABORATION

We all bring unique qualities, and together a diverse team delivers much more than a collection of individuals. When we help others to feel included in the team, everyone has the opportunity to make their voice heard. Building relationships across the business allows us to work together, share our expertise and help others.

COSTUMER FOCUS

Our expertise, professional insight and passion are key to our success. We manage every stage of our interaction with external customers to ensure successful outcomes and good future relationships. We all have a customer to support, either external or internal.

We achieve extraordinary results for our external customers by delivering on our commitments to our internal customers.

EXCELLENCE

The pursuit of excellence is a never-ending quest.

No matter how much we may improve, we continuously strive for further improvements to build a sustainable business for the future. We must constantly grow our own skills and use our strengths to drive higher performance and a sense of personal achievement.

RESPECT

People are important to us, and how we treat each other every day creates our experience of working here. We listen with respect because people feel valued when they feel heard and understood. Taking different and diverse perspectives into consideration, helps us generate new ideas and make better decisions. We are respectful of the natural environment and the local communities in which we operate.

INTEGRITY

We take pride in our commitment to integrity because success only matters when achieved fairly. We believe that winning with integrity leads to sustainable success.

Fairness is important, we respectfully challenge where we see wrongdoing and ensure that everyone lives by our Values.

ETHICAL CONDUCT

a. Antitrust and competition

Competition laws are designed to promote free and fair competition. Where this is achieved, efficient and innovative organisations, like our own, prosper and customers receive the best products at the best price. It is Italgestra's policy to conduct its business in accordance with the competition laws of all the countries in which it operates. Competition laws apply to every aspect of our business and at every level: international, European and national.

b. Laws against corruption

The Company expects the highest standards of conduct and integrity from all the Recipients as well as its third-party distributors, agents and intermediaries. It is Company's policy to conduct its business free of any bribery or corruption. The Company will not enter into contractual relationships with third parties that are known to engage in corrupt practices and will not engage in the giving or receiving of bribes or favours that create a conflict of interest.

c. Gifts and hospitality

The Company recognises that the giving and accepting of gifts, entertainment and hospitality can be part of building normal business relationships. This practice can vary significantly between the various geographical locations in which the Company does business. In some cultures, business gifts play an important role in business relationships. However, regardless of local laws and customs some gifts and hospitality can lead to the suggestion that an improper influence has been asserted either on or by the Company, or that a conflict of interest has arisen compromising our ability to make objective and fair business decisions. It can never be suggested that there was an improper motive behind the offer or acceptance of the gift or hospitality, of unduly influencing the recipient, or on the part of the recipient in accepting it.

d. Tax and customs

The Company recognizes that the tax system must be based on a relationship of trust and collaboration between the citizen and the revenue authorities. Personnel and persons who carry out activities in the interest of the Company must pay particular attention to the need to comply with the tax obligations imposed by law.

Furthermore, the size of the Company's activities determines the need to know and comply with the legal provisions on customs law and international commercial law.

e. Accounting Transparency

All actions and transactions must be properly recorded, authorized, verifiable, legitimate, consistent and appropriate. All actions and transactions must be properly

recorded and it must be possible to verify the decision-making, authorization and performance process.

Accounting transparency is based on the accuracy, completeness and authorization of the information underlying the relevant accounting records.

f. Compliance with Copyright applicable laws

The Company is committed to compliance with applicable copyright laws. The use of copies and illegal duplication of software constitutes a crime that can have serious consequences for the company or the end user. The Italian legislation protects software with appropriate laws, in line with the technological evolution and with the directives of the European Union, which provide for penal and administrative sanctions for those who violate these laws. Among other things, the current law provides for incisive actions and administrative fines for those who purchase non-original software. As such, and in accordance with applicable law, the Company is committed to always providing original software products, or authorized copies thereof, especially if they are third party products required to complete a specific solution. Such products must be licensed for use. If the third-party software components used are integrated into the solution offered, this must be specifically mentioned.

g. Marketing activity

The Company is committed to only providing factual information in marketing campaigns. The Company is also committed to complying with the Privacy Act with respect to addresses and other information relating to the target audience of our campaigns and will provide anyone who requests it with information on how their name was found and the ability to remove themselves from the lists.

h. Suppliers relations

The Company is committed to purchasing products and services only from suppliers who share its commitment to quality, innovation, customer satisfaction, value for money, and sustainability. The Code focuses on the social needs and expectations of the stakeholders of the Company, while anticipating new environmental, social, legal and economic developments.

The Company is committed to the highest standards of business conduct and ethics. Global excellence for the Supply Chain Initiative finds its key drivers in sourcing and procurement. The Company therefore asks its suppliers to join this initiative and commit to the principles listed in this Supplier Sustainability Code.

i. Customer relations

The customer is the heart of the company's activity: the work is carried out first of all to ensure the growth of the customer himself. A customer is anyone who uses the services and works of the company in any legal form.

j. Centrality, development and enhancement of human resources and equity of authority

The company recognizes the centrality of human resources and believes that an essential factor of success and development is the professional contribution of the people who work there.

The company has always placed the professionalism and individual contribution of its people at the centre of its work, continuing a style of relationship that aims to recognize the work of each as a fundamental element of business and personal development. At the same time, the company places at the centre of its daily work the dialogue, the exchange of information - at any level - the enhancement and professional development of its employees and the establishment of a corporate identity and its sense of belonging. This value is translated into:

- the creation of a work environment capable of enhancing the contribution and potential of the individual through the gradual empowerment of staff;
- the creation of a system of relationships that favours teamwork over hierarchical relationships;
- the daily effort aimed at sharing skills and knowledge also through the use of innovative systems.

The company gives importance to those who work within its organization, contributing to the development of the same because it is through human resources that the company is able to provide, develop, improve and ensure optimal management of its services. Without prejudice to the provisions of the law and contractual obligations of workers, employees are required professionalism, dedication to work, loyalty, spirit of cooperation, mutual respect, sense of belonging and morality. In the management of contractual relationships involving the establishment of hierarchical relationships, our company is committed to ensuring that authority is exercised with fairness and correctness and that all forms of abuse are avoided: in particular, the company ensures that authority does not turn into the exercise of power detrimental to the dignity and autonomy of the person. These values must in any case be safeguarded when making choices regarding the organization of work.

k. Policy of quality, environmental and occupational health and safety protection (Q-HSE)

The company is aware of the importance of continuous improvement for the company's development of the quality of its product and service to customers.

To this end, it has chosen to follow the principles of the reference standards UNI EN ISO9001:2015, UNI EN ISO45001:2018, UNI EN ISO14001:2015.

Based on this belief, the Company defines the QHSE Policy and works actively in drawing up improvement programmes, setting targets and allocating the necessary human and material resources.

Objectives and methods defined follow:

- maintain and improve the application of its integrated management system for Environmental and Occupational health and safety protection (Q-HSE) in accordance with UNI EN ISO 9001:2015, UNI ISO45001:2018, UNI EN ISO14001:2015;

- plan its own system, systematically implementing the criteria defined in its "Understanding and Determining Context Factors" procedure for systematically monitoring and reviewing the most important and critical internal and external factors for its own purposes, as well as the needs and expectations of stakeholders;
- improve its organisation to provide products and services that meet customer requirements in terms of quality, price and punctuality;
- improve the service provided in terms of quality, safety and environmental protection by actively collaborating with stakeholders;
- apply in a conscious and systematic way the fulfilments related to safety at work, as provided for by Legislative Decree No. 81/2008 and integrations. Consequently, update and increase, through training and information, the preparation and awareness of personnel. Share the criteria adopted for safety at work with customers and guests;
- continue to ensure the compliance of its products with national and international technical standards and Community Directives (CE label), through its commercial evaluation and purchasing processes;
- consolidate the relationship with its external suppliers;
- continue to manage identified product, process, environmental and safety-related non-conformities by implementing remedial and corrective actions and systematically verifying their effectiveness;
- maintain an active maintenance schedule for infrastructure, machinery and equipment, in order to prevent any potential malfunctions and unsafe conditions or environmental hazards;
- actively promote the corporate values of Safety, Collaboration, Customer Focus, Excellence, Respect and Integrity, which underpin decision-making, guide daily behaviour and define the corporate culture.

1. Compliance with competition law

Without prejudice to compliance with the rules on free competition, all employees are required to act in such a way as to achieve the best results in competition. It is contrary to the company's policy to have exchanges of information and/or agreements, understandings with any competitor regarding prices, pricing policies, discounts, promotions, sales conditions, production costs: the company does not want in any way to restrict or distort the free play of competition. It is similarly prohibited any form of agreement, direct or indirect, which is made or put in place with competitors in order to disrupt the progress of public tenders for supplies. Any employee or collaborator working in the commercial activity is therefore invited to submit to the management any doubt or initiative that may fall within the cases sanctioned by the law, in order to operate in full compliance with the rules.

RULES OF CONDUCT

a. Conducting business

All recipients must refrain at all times from offering or promising, directly or through intermediaries, any kind of personal or improper advantage in order to obtain or retain business or other benefits from third parties, whether public or private entities. No one shall pay or accept bribes, or make or accept improper payments, and no one shall

engage in any conduct that violates, or causes any business partner to violate, any applicable anti-corruption law or regulation, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

b. Public Administration relations

The term “Public Administration” refers to any person, subject or interlocutor that can be qualified as a Public Official or Person in Charge of a Public Service operating on behalf of the central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private partners who are concessionaires of a Public Service.

The company inspires and adapts its conduct, in relations with the Public Administration, to the principles of fairness and honesty. On this basis, the persons entrusted by the company to follow any negotiation, request or institutional relationship with the Public Administration, whether Italian or foreign, must not for any reason seek to improperly influence its decisions or behave illegally, such as offering money or other benefits, which could alter the impartial judgement of the representative of the Public Administration. The persons entrusted by the company organisation with the management of relations with any authority of the Public Administration must check that the information provided in any way and for any reason is true, accurate and correct.

When carrying out tenders, the persons appointed by the company must comply with the law and the relative regulations on working relations with former employees of the Public Administration. The hiring of former employees of the Public Administration who, in the performance of their duties, have had relations with the company or their relatives and/or relatives-in-law, takes place in strict compliance with the standard procedures defined by the organization for personnel selection. The definition of other working and/or consulting relationships with former employees of the Public Administration or their relatives and/or relatives-in-law, is also carried out in strict compliance with standard procedures.

Grants, contributions, subsidies or funding obtained from the European Union, the State or other Public Entity, even if of modest value and/or amount, must be used for the purposes for which they were requested and granted. The Company prohibits the recipients of this Code of Ethics from using funds received from Public Administrations and/or interprofessional funds for purposes other than those for which they were granted.

c. Accounting Transparency

Each employee is required to collaborate in order to ensure that management events are correctly and promptly represented in the accounts. Adequate supporting documentation of the activity carried out is kept for each transaction in order to allow for easy accounting entries, the identification of the various levels of responsibility and the accurate reconstruction of the transaction, also to reduce the likelihood of misinterpretation. Each record must accurately reflect what is reflected in the supporting documentation. All documentation must be promptly and systematically archived so that the relative accounting picture can be reconstructed at any time: in addition to archiving in the appropriate paper binders, if provided for, documents must also be stored in electronic media from which they can be quickly traced and viewed using appropriate document software. In any case, it is the duty of each employee to ensure that the documentation relating to his or her activity is easily traceable and

ordered according to logical criteria. In any case, company payments to be made must be exclusively commensurate with the service and methods indicated in the contract and cannot be made to a party other than the contractual counterpart. The use of Company funds for illegal or improper purposes is strictly prohibited. No one should be paid anything that is not based on a properly authorized business transaction, or any illegal form of remuneration. Any neglect, omission or falsification of which employees become aware must be promptly reported to management.

d. Use of company's tools

Employees are required to ensure the most respect for the Company's infrastructures, means, tools and materials, promptly reporting to their supervisor any improper use of such equipment that they believe others may be making. These categories include, for example, premises, furniture and furnishings, operating equipment and facilities (such as company cars, tools, personal computers, printers, photocopiers, servers, or even communication tools such as telephone, fax, e-mail, personal stationery, paper), features offered by the company's information system (such as processing procedures, software, access to the internet and databases and the like), books, manuals, newspapers and magazines in general. The employee is required to use the company's equipment only for the performance of the work duties for which he/she is responsible. It is therefore strictly forbidden for employees to use the company's equipment, whether IT, technical or any other type of equipment, for private purposes or in competition with the company's activities. Employees are allowed to use company equipment and/or material outside the company facilities only in cases of use for company reasons, such as, for example, business trips to locations other than the usual one, work on secondment, and the like. In all other cases, express authorization from your superior is required.

e. Rules of conduct - marketing

For the purposes of carrying out marketing activities, associated companies undertake to:

- manage, in accordance with current privacy regulations, the names and data contained in their mailing lists and not to send untruthful or defamatory information via e-mail;
- not to carry out "spamming" actions on current and potential customers, to give the possibility to unsubscribe from the mailing lists at any time and to provide at any time information on how a user's data has been retrieved;
- equip itself with all the necessary technological tools to ensure that, when sending communications via e-mail, no files are attached that may contain computer viruses capable of damaging the contents of receiving computers or their e-mail systems.

f. Safety at work

The Company, providing human resources means and funds, and all employees and consultant of the Company, anyone within his own duties, shall:

- pursue the targets of improvement of the safety and health of workers, as integral part of its activity and as strategic commitment as regards general purposes of the company;

- make sure that the new activities, or during the audit of the existing activities, the safety issues are considered as an essential content;
- make sure that all the employees are trained, informed and sensitized in order to perform their activity in safety conditions and to take responsibility for the safety and health of workers;
- make sure that all the corporate structure (managers, persons in charge, designers, installers, purchase and maintenance service, employees, etc.) participate, on the basis of their own competences and attributions, to the achievement of the safety targets, in particular with regard to:
 - the design of machines, fixtures and fittings, regarding places of work, operative methods, and organizational aspects, so they can be made in order to protect the health of workers, the corporate assets, the third parties and the community in which the enterprise operates;
 - the fact that each person performs his functions also with the purpose of preventing occupational accidents and diseases, and so that the design, management, maintenance, including the cleaning activity of the place of work, machines and fixtures is aimed at such purpose;
 - the information about the corporate risks, in order to diffuse to all managerial functions, such as persons in charge and employees, and to the training of them, in order to perform and update it with reference to the activity performed;
 - the necessity of fulfilling the attributions and the competences of each person with rapidity, efficacy and diligence, so that the needs coming out during the working activity are managed without imprudence, negligence or unskilfulness;
 - a process of cooperation between all various corporate resources and the external entrepreneurial organizations;
 - all laws and regulations in force have to be observed, and they have to follow the corporate standards designed;
 - the total social costs for safety and health at work, including the costs that come from accidents and diseases related to work, have to be progressively decreased, minimizing the risks to which the employees or third parties can be subject (clients, suppliers, visitors, etc.)

g. UK Modern Slavery Act

The Company, its suppliers, and all entities and individuals within its supply chain must comply with the Modern Slavery Act of 2015. Specifically, with respect to labour practices within its supply chain, it must be ensured that:

- All forms of illegal, forced or compulsory labour, slavery and servitude are eliminated;
- No individual is induced by force, threat or deception to provide services or benefits of any kind to another or to allow another to acquire benefits of any kind;
- No individual or group is involved in human trafficking. Trafficking means: recruiting, transporting, transferring, harbouring, receiving, transferring or exchanging control of, or otherwise arranging or facilitating the travel of any individual who travels for the purpose of being exploited through any type of forced or compulsory labour, slavery or servitude.

h. Environmental Safety

The Company must always comply with the applicable law on environmental safety and, in particular, with Legislative Decree No. 152/2006 ("Environmental Code"). The Company, certified ISO 14001, must respect the environmental management systems set up to obtain certification and also make continuous records of data relating to:

- dangerous substances purchased and used;
- raw materials purchased and used;
- consumption (of water, fuel, energy);
- waste;
- atmospheric emissions;
- water discharges.

In compliance with the Environmental Code, it is expressly forbidden for the heads of departments, directly, and for employees and partners, including where necessary by means of special contractual clauses, to carry out:

1. conducts that might integrate the types of offences referred to in Article 25 undecies of Legislative Decree No. 231/2001;
2. conducts which, although not constituting predicate offences per se, fall within those identified below, may potentially integrate the conduct constituting such offences.

With the purpose to prevent the commission of such offences, it is necessary to:

- know and comply with all laws and regulations governing the company's activities, with particular reference to environmental and protection regulations;
- to manage any relationship relating to the above-mentioned environmental regulations with criteria of maximum correctness and transparency.

i. US Dodd-Frank Act

The Company recognizes the importance of traceability of the origin of the materials that are used for its business and therefore must comply with the provisions dictated by the US Dodd Frank Act.

Employees and persons who carry out activities in the interest of the Company must pay particular attention to the need to ensure that the purchase of such materials does not finance or directly or indirectly involve armed groups or those who perpetrate human rights abuses.

j. Conflicts of interest

In order to avoid conflicts of interest, all transactions and activities must be undertaken solely and exclusively in the interest of the company and in a lawful, transparent and correct manner. Employees must avoid all situations and activities in which a conflict may arise with the interests of the company or which may interfere with their ability to make impartial decisions in the interest of the company and in full compliance with the provisions of this Code of Ethics. Employees are required to avoid conflicts of interest between personal and family economic activities and the duties they hold within the structure to which they belong. Any situation that may constitute or give rise to a

conflict of interest must be promptly reported to management. By way of example, but not limited to, the following may determine a situation of conflict:

- economic and financial interests of the employee and/or his/her family exercised in competition or conflict with those of the company;
- performance of work activities, of any kind, with customers, suppliers and company's competitors;
- acceptance of money, favours or benefits from persons or companies that are or intend to enter into business relations with the company.

Given the variety of citations that may arise, if there is any doubt as to whether or not a conflict of interest exists, employees should contact their manager for clarification.

k. Customer relations

What has been anticipated to the customer must be carried out in a complete, precise and punctual way. The system or solution provided to the customer must always be tested in advance, must meet the characteristics of reliability and safety, as established in the design phase, otherwise it will be replaced at the expense of the company. Company employees are obliged to:

- comply with internal procedures for the management of customer relations;
- provide accurate and comprehensive information about the products and services offered so that the customer can make informed decisions;
- comply with the truth in advertising or other communications.

l. Suppliers relations

Procurement Reports

In the procurement reports and, more in general, of supply of goods and/or services, employees are required to:

- comply with internal procedures for the selection and management of relationships with suppliers;
- obtain the collaboration of suppliers in constantly ensuring that customer requirements are met in terms of quality, cost and delivery times;
- observe and enforce contractual terms and conditions and maintain a frank and open dialogue with suppliers, in line with good business practice;
- bring problems with a supplier to management's attention so that the consequences can be assessed.

Compliance obligations for suppliers

For the policies listed in the following sections, suppliers should at least be compliant with the following:

- United Nations Universal Declaration of Human Rights;
- The 10 principles of the United Nations Global Compact;
- The International Labour Organisations Fundamental Conventions;
- The Guiding Principles of the Organisation for Economic Co-operation and Development (OECD);

- The Core Conventions of the International Labour Organisation (ILO)
- The rules of conduct of the International Chamber of Commerce (ICC)
- The UK Bribery Act 2010;
- The US Foreign and Corrupt Practices Act;
- The UK Modern Slavery Act 2015;
- The US Frank-Dodd Act;
- Any other relevant international convention and national and local regulations applicable to their activities in the country(ies) in which they operate.

Any more restrictive Italgestra policies will be given priority.

Sustainability and environmental obligations for suppliers

Suppliers shall implement initiatives that contribute to the preservation of the environment and mitigate their impact on natural resources. The Company requires its suppliers to comply with all applicable legal environmental requirements and demonstrate continual improvement of its environmental performance. Suppliers shall:

- Environmental Permits and Reporting: make sure that it obtains, keeps current and follows the reporting guidelines of all the required environmental permits and registrations and to be legally compliant at all time;
- Environmental Management: document and implement a relevant environmental management system (based on international standards such as ISO 14001:2004), designed to identify, control and mitigate significant environmental impacts, and preferably suppliers are either certified to ISO50001 or are working towards accreditation;
- Hazardous Materials: identify hazardous materials, chemicals and substances that exist in any aspect of its supply chain, and ensure their safe handling, movement, storage, recycling, reuse and disposal. All the applicable laws and regulations related to hazardous materials, chemicals and substances shall be strictly followed. Suppliers shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Suppliers shall ensure that key employees are aware of and trained in product safety practices;
- Natural Resources: minimise its consumption of natural resources, including energy and water. Suppliers shall implement and demonstrate sound measures to prevent pollution and minimise generation of solid waste, wastewater and air emissions. Prior to discharge or disposal, the supplier shall characterise and treat wastewater and solid waste appropriately and according to applicable laws and regulations, the supplier should have a long-term goal of achieving zero disposal to landfill of materials from their operations;
- Products: promote the development of environmentally friendly technologies as well as energy saving and recycling solutions whilst also implementing logistics strategies that minimise environmental impact.

Ethical principles for suppliers

Suppliers shall strictly comply with all applicable ethical trade laws and regulations related to their activities and business environment and, with the Company, commit to international conventions. In particular the Company requires the following from its suppliers:

- Competition: compliance with all applicable laws and regulations related to fair competition as set out the Group's Competition Law Policy;
- Corruption / Anti-bribery: The supplier must never, directly or through intermediaries, offer or promise any personal or improper advantage in order to

obtain or retain a business or other advantage from a third party, whether public or private. The supplier will not pay or accept bribes, arrange or accept kickbacks and shall not take any actions to violate, or cause its business partners to violate, any applicable anti-bribery laws and regulations including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act;

- Money Laundering: compliance with all laws related to money laundering. The Company's suppliers shall not be involved in, or support money laundering practices;
- Conflicts of Interest: The Supplier is expected to report to the Company any situation that may appear as a conflict of interest, and disclose to the Company if any of the Company's employee or professional under contract with the Company may have an interest of any kind in the supplier's business or economic ties with the supplier;
- Gifts & Hospitality: refraining from offering gifts and hospitality to the Company's employees. The Company will refuse all gifts and hospitality that are not of reasonable, modest and of symbolic value only;
- Conflict Minerals: compliance with all applicable laws on conflict minerals;
- Grievance mechanisms: The supplier shall have systems in place enabling anonymous grievances, reporting and management. A designated officer shall continuously monitor the grievance mechanism, keep records on the issues raised and take appropriate actions on a confidential manner;
- Records: The supplier shall maintain transparent and up to date books and records to demonstrate compliance with applicable materials, services, governmental and industry regulations and shall make available such records to the Company upon request;
- Origin: The supplier shall be capable to disclose all the potential sources of primary origins (country of origin) associated with deliveries made. The Company reserves the right to ask the Supplier to create, at a point of time, full supply chain mapping back to origin to facilitate assessment of supply chain compliance.
- Human Rights: The supplier undertakes to comply with the Company's human rights policies and the UK Modern Slavery Act.