
COMPANY CODE OF ETHICS

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1. FOREWORD

This document defines the set of values and **ethical** and **moral principles** underpinning the operations of Alfamation S.p.A. and the behavioural guidelines adopted to guarantee the company's functionality, reliability, compliance with laws and regulations, and reputation.

The principles that have always inspired this company's operations are formally combined in a Code of Ethics, in the conviction that reliability is built day after day, working in compliance with the rules and empowering people.

This Code of Ethics is therefore a distinctive and identifying element in relation to the market and third parties, awareness and sharing of which, as required by all persons working or collaborating with the Company, constitute the basis of our activity and the first step in the pursuit of our **vision**.

The aim of Alfamation S.p.A. is thus to pursue excellence on the market in which we operate, by means of sustainable development while protecting the **environment** and the **health** and **safety** of the people involved by adopting models of behaviour respectful of social ethics, generating satisfaction and added value for employees, customers and the community at large.

The company follows a general policy of compliance with UNI EN ISO 9001:2015 and CSIA standards and with various different customer specifications thanks to our use of a quality management system as a practical corporate management tool.

1.1. Aims and addressees

This Code of Ethics illustrates the set of ethical and moral principles and behavioural guidelines adopted by Alfamation S.p.A. both within its business operations (in relations between employees) and externally (in relations with institutions, suppliers, customers, commercial partners, political and union organisations and the media, hereinafter, collectively, "**Stakeholders**").

This Code is binding on all **Addressees** both working inside the company (directors, statutory auditors, managers, executives, employees) and persons who cooperate with the company on a permanent or temporary basis from the outside (external collaborators, consultants, suppliers).

2. GENERAL PRINCIPLES AND CRITERIA OF CONDUCT

Conduct of the Addressees, at all levels of the company, is inspired by principles of lawfulness, fairness, anti-discrimination, confidentiality, diligence, loyalty, and respect for human rights.

2.1. Honesty, moral integrity, fairness, transparency, and objectivity

In execution of the operations and in relationships of any type and nature, all those who work with and on behalf of Alfamation S.p.A. must diligently comply with the statutory laws and regulations of the countries in which the company conducts its activities, and with the Code of Ethics and internal regulations. All must adopt a mode of conduct inspired by respect for the core principles of honesty, moral integrity, fairness, transparency, objectivity, and respect of the individual personality in the pursuit of corporate goals and in all relations with people and entities inside and outside the company.

Therefore, Alfamation S.p.A. shall not enter into or proceed with any type of relationship with whosoever adopts conduct that does not comply with the matters set down in this specific point of the Code of Ethics.

2.1.1. Transparency

The Addressees, employees first and foremost, must collaborate to ensure the operating events are represented correctly and promptly based on truthful and accurate information, and that each operation and transaction is correctly recorded in the company accounts.

2.2. Anti-discrimination

In relations with any party inside or outside the company, Alfamation S.p.A. repudiates all forms of discrimination based on age, gender, race, sexual orientation, state of health, political views and union allegiance, philosophical creed or religious convictions, culture and nationality of its stakeholders.

2.3. Information confidentiality and processing

Alfamation S.p.A. undertakes to guarantee protection and confidentiality of the information and personal data of the Addressees and Stakeholders, in compliance with the applicable personal data protection legislation.

The Addressees must not use confidential information obtained through their work activities for reasons other than the exercise of said activity and must always act in accordance with the confidentiality obligations assumed by the company in relation to all stakeholders.

In particular, the Addressees must use the utmost confidentiality in relation to all types of data, whether stored, processed, or viewed in hard copy or digital form, capable of revealing the company's know-how and/or heritage, transport information, commercial information, and corporate transactions.

Alfamation S.p.A. applies control measures aimed at guaranteeing the security of its information systems, thus preventing the commission of cybercrime offences. Each employee must work diligently to protect the company's tangible and intangible assets assigned to him or her and to prevent harmful or improper use of such assets by adopting responsible behaviours in line with the objectives and operating rules regulating the use of assets, which must also be accurately documented.

2.4. Quality and safety of products and supplies

Alfamation S.p.A.'s operations are oriented towards protecting its customers and meeting their needs, also considering the community in which the company operates and applying the highest product quality and safety standards.

Alfamation S.p.A. has implemented a Quality management system and it directs its development and marketing activities towards the highest service and product quality standards.

2.5. Loyalty

Alfamation S.p.A. complies with statutory legislation in relation to competition, undertaking also to comply with regulations protecting industrial and intellectual property rights, including industrial secrets, in the countries in which it operates, and it also aims to assure fair competition, abstaining from collusive and unfair conduct that could result in the definition of forms of unfair competition. Specifically, Alfamation S.p.A. requires the commitment of the Addressees in promoting fair competition, in compliance with national and international legislation, in the awareness that virtuous and non-predatory competition forms a healthy incentive for the processes of innovation and development, thus protecting consumer interests and those of the community.

2.6. Respect for human rights

Alfamation S.p.A. embraces the principles set down in Italian law 231/01 and strives to promote respect for universally recognised human rights within its sphere of influence and ensures it does not contribute to the abuse of human rights, even indirectly.

3. RELATIONS WITH EMPLOYEES AND COLLABORATORS

3.1. Personnel selection

Assessment and recruiting of candidates must be carried out based on correspondence of candidate profiles with the company's requirements, in accordance with principles of fairness and transparency, and respecting equal opportunities of all the parties concerned.

The information to be supplied by candidates must be strictly connected to checking the professional-psychological profile and aptitude of each individual and to respect with the associated legal requirements.

Alfamation S.p.A. undertakes to adopt all useful provisions to avoid all forms of favouritism in the personnel recruitment process, employing objective and merit-based criteria that respect the candidates' dignity and further the positive performance of the company's operating activities.

3.2. Personnel management

Alfamation S.p.A. protects and empowers its people, undertaking to constantly maintain the necessary conditions for career development and the expansion of the knowledge and skills of each individual, holding refresher courses and other initiatives aimed at achieving this goal.

The company also promotes participation of personnel in the life of the company, offering occasions for participation in discussions and decisions that are functional to the pursuit of its goals; the employee must participate in such initiatives with a spirit of collaboration and independent judgement.

Alfamation S.p.A. is resolutely committed to opposing all forms of mobbing, stalking, psychological violence and any conduct that is discriminatory or that harms the dignity of the individual both on and off the company premises.

Relations between employees must be conducted with reciprocal loyalty, integrity and respect, in compliance with values of civil coexistence and freedom of the individual.

4. WORKPLACE

Alfamation S.p.A. undertakes to provide its personnel with a healthy and safe workplace that is respectful of the dignity of the individual.

The company is also committed to guaranteeing freedom of association and the right of collective bargaining, repudiating all forms of forced labour and child labour.

Safety in workplaces is guaranteed by means of:

- rigorous implementation of the provisions set down in statutory legislation;
- active promotion of a culture of safety by means of specific training programmes. Personnel training is a central aspect of the management system adopted;
- adopting measures aimed at limiting and, wherever possible, eliminating the negative impact of the economic activity on the environment, not only when the risk of harmful or hazardous events has been proven (preventive action principle) but also when it is not certain whether and to what extent the operating activity exposes the environment to risks (precautionary principle);
- prioritising the adoption of measures designed to prevent any harm to the environment, rather than waiting until damage actually occurs and then attempting to remedy it;
- planning precise and constant monitoring of scientific progress and regulatory evolution in the environmental sphere;
- promoting the values of training and sharing of principles of the code among all persons operating in the company, whether top management or subordinates, to ensure they follow the established ethical principles, especially when decisions must be made and, subsequently, when the actions decided must be put into effect.

Moreover, the company protects the health of its personnel and also guaranteeing respect of the rules of hygiene and health protection; moreover, Alfamation S.p.A. complies with statutory environmental laws and regulations, contributing to sustainable development of the local area, also through constant monitoring of company processes, reducing consumption of raw materials and energy, optimising the use of natural resources, reducing emissions and waste products when defining its manufacturing processes, and carefully selecting materials, packaging, distribution, and management of its products in accordance with the instructions of its customers.

5. CRITERIA OF CONDUCT IN RELATIONS

5.1. Relations with Authorities and Public Administrations

Relations with the authorities and the public administration must be based on the utmost clarity, transparency, and collaboration, in full respect of the law and in accordance with the highest ethical and professional standards.

No one is permitted to enter into relations with the authorities and public administration in the name of and on behalf of Alfamation S.p.A. unless explicitly authorised to do so.

Relations with public officials, with civil servants and with the public administration in general must take place exclusively through persons in possession of an explicit mandate received from company representatives, using the maximum levels of fairness and

integrity, abstaining from any form of coercion, whether explicit or implicit, aimed at obtaining any undue advantage for themselves or for Alfamation S.p.A.

Alfamation S.p.A. is committed to the prevention of acts of bribery and corruption and prohibits all Addressees from offering or receiving cash, gratuities or gifts and from violating the laws governing such matters, and also prohibits the pursuit of personal interests that differ from the interests of the company.

5.2. Relations with political organisations and trade unions

Alfamation S.p.A. abstains from making any undue contributions in any whatsoever form to political parties, trade unions, or other social structures, except in the presence of specific derogations and anyway always in the limits of the amounts permitted by statutory legislation, in Italy and in other countries; the company also refrains from sponsoring conventions and symposia held with the sole purpose of political/electoral propaganda.

5.3. Relations with customers and suppliers

Courtesy, competence, professionalism, respect and fairness constitute the guiding principles and style of conduct to be adopted in relations with customers.

In particular, to protect the company's reputation, it is essential to abstain from any form of unfair or misleading conduct that could induce customers or suppliers to rely on groundless claims or misrepresented circumstances.

Relations with suppliers are inspired by principles of loyalty, fairness, and transparency.

The selection of suppliers is based on objective criteria of economy, quality, appropriateness, efficiency, and lawfulness.

When negotiating with suppliers, it is the responsibility of each Alfamation employee and representative to promote the interests of the company in compliance with the limits of the law, to take advantage of the best opportunities and to achieve the best conditions, without favouritism of any form due to relationships of friendship or based on discriminatory attitudes prohibited by the terms of this Code.

6. CRITERIA OF CONDUCT FOR PREVENTION OF MONEY LAUNDERING

In the framework of the various relations entered into with the company, the parties to whom this Code of Ethics applies must not, in any way or under any circumstances, be involved in matters connected to laundering of money originating from criminal activities or handling of illegally sourced goods or other assets.

Acting through the relevant bodies, Alfamation S.p.A. undertakes to comply with all national and international laws and provisions aimed at preventing money laundering.

7. IMPLEMENTATION AND AWARENESS OF THE CODE OF ETHICS

Each Addressee must comply with this Code of Ethics and must explicitly accept its contents.

Moreover, Alfamation S.p.A. asks its main suppliers and partners to adopt conduct in line with the general principles set down in this Code. Compliance with the rules of the Code is an essential part of the contractual obligations of all employees pursuant to art. 2104 of the Italian Civil Code.

7.1. Implementation

This Code of Ethics was approved by the Sole Director of Alfamation S.p.A. on 20/02/2020.

Any amendments and/or updates will be approved by the same body and then communicated to all stakeholders.

7.2. Awareness and knowledge of the Code of Ethics

The Code of Ethics is brought to the attention of internal and external stakeholders. The Code of Ethics is published on the corporate website.