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			Rev. 0
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1. PURPOSE

This Code of Ethics has been developed to ensure that the fundamental ethical values of Lineamec Srl are clearly defined and constitute the foundational element of the corporate culture, as well as the standard of conduct for all addressees, in whatever capacity involved in the Company's activities.

2. SCOPE OF APPLICATION

This Code of Ethics applies to Lineamec Srl, to the affiliated companies and to its partners. It is binding for all employees, collaborators and persons who, directly or indirectly, in a stable or temporary way, establish relationships with the company contributing to the achievement of the company's objectives.

The Company requires observance of the Code's principles also by customers, suppliers, external collaborators, professionals, third parties and stakeholders.

The Code is valid for all business activities, both in Italy and abroad, taking into account the cultural, social and economic specificities of the various countries.

Lineamec Srl commits, as regards all those involved in the application of this Code, to:

- ensure its timely dissemination to all and respond to any requests for clarification;
- ensure its periodic review and updating in order to adapt it to the evolution of legislation, environmental conditions and civil awareness;
- adopt an appropriate system of sanctions to punish any violations;
- adopt appropriate procedures for the reporting, investigation and handling of any violations;
- ensure confidentiality of the identity of those who report potential violations, save for legal obligations, and their professional protection;
- periodically verify compliance with the Code of Ethics.

• Commitments of collaborators

The Code of Ethics is an integral part of the employment relationship; for this reason all Stakeholders commit to:

- act and behave in line with the Code of Ethics;
- report all violations of the Code of Ethics as soon as they become aware of them;
- cooperate in the definition and adherence to internal procedures set up to implement the Code of Ethics;
- consult their superior, or the designated bodies, with respect to parts of the Code of Ethics on which they require interpretation or guidance.

3. OPERATING MODALITIES

3.1 Social Responsibility Principles

Management has identified social responsibility as a strategic management tool, aimed at strengthening the Company in pursuing objectives of product and workplace safety, sustainable development and transparent communication toward customers and the community.

The policy and strategies adopted in the field of social responsibility translate into the assumption of socially responsible behaviours, as specified below, both toward stakeholders and the community as a whole.

These behaviours help to reinforce the good reputation of the Company — considered an intangible resource of primary importance — both within the organisation and externally.

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4. GENERAL PRINCIPLES AND RULES OF CONDUCT

4.1.1 General Principles

Lineamec falls, from a civil-law and labour-law perspective, under a private-law regime. This entails the Company's ability to hire its personnel with maximum discretion, in compliance with applicable legislation and collective labour agreements.

The employment relationships entered into materialise in individual contracts concluded between the employee and Lineamec.

The Company applies the National Collective Labour Agreement of the metal-mechanical sector. For matters not expressly provided for by this Regulation or by the applicable NCCLA, the ordinary statutory provisions on subordinate employment in relation to private employers apply.

All employees, collaborators and, more generally, all those operating in the name of and on behalf of the Company must comply with the following basic behavioural rules:

- **Legality:**

Each employee and collaborator, in the performance of their activities, must act in compliance with current laws and internal company regulations, operating with integrity, correctness and confidentiality.

Lineamec does not pursue unlawful purposes nor resort to illegal means to achieve its objectives. The Company bases all its activities on full and rigorous respect for legality, both in relations with public authorities and with private enterprises, as well as towards the community and its own personnel.

- **Transparency:**

Lineamec is committed to ensuring that stakeholders are provided with complete, transparent, clear and accurate information. Transparency represents a fundamental principle for building fair and responsible relationships, so that all parties involved can make informed decisions, based on full knowledge of the facts and interests at stake.

In bilateral relationships, this principle translates into the drafting of contracts that are clear, understandable and consistent, protecting both parties.

- **Responsibility and cooperation:**

Each employee is required to carry out their work activity with diligence, efficiency and correctness, making responsible use of the tools and time at their disposal, and fully assuming the responsibilities associated with their tasks.

They are also encouraged to actively contribute to the continuous improvement of the organisation, identifying and proposing to the Management any useful actions to optimise their activities and, more generally, business processes.

- **Confidentiality:**

Each employee must guarantee the utmost confidentiality regarding information and data that constitute the company's assets or relate to work activity, respecting the applicable legislation, the company regulations and the internal procedures.

In addition, in accordance with data protection regulations, the addressees of the Code of Ethics are required to protect all information acquired or generated in the performance of their functions, avoiding any improper or unauthorised use.

- **Impartiality:**

Lineamec operates in respect of the principle of impartiality, which constitutes a fundamental value in the exercise of every business activity.

All collaborators must base their conduct on this principle, avoiding any behaviour that may be, or may appear, discriminatory towards persons, groups or organisations.

- **Respect for the person:**

Lineamec protects the physical, moral and cultural integrity of the person, promoting mutual respect in interpersonal and professional relationships. Under no circumstances shall pressure, threats or requests be tolerated aimed at inducing anyone to act against the law or to behave contrary to personal, moral or cultural beliefs of individuals.

The Company actively commits to preventing and combating all forms of discrimination based on age, gender, sexual orientation, health status, ethnicity, nationality, political opinions or religious beliefs, in all decisions that affect relationships with employees, collaborators and other stakeholders.

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• **Environmental protection and health & safety in the workplace:**

Aware of the environmental relevance of its production activities, Lineamec is committed to guaranteeing the utmost respect for the environment, both inside the plant and in the external context, to protect all stakeholders.

In this perspective, the Company promotes the continuous improvement of technologies and production practices, adopting all necessary measures to prevent accidents and minimise any negative impact on the community and the environment.

• **Protection of health and safety in the workplace:**

The Company also undertakes to promote and disseminate the culture of safety, increasing awareness in risk management and encouraging responsible behaviour in order to safeguard the health and safety of all employees and collaborators.

Compliance with safety regulations is mandatory for all staff, with particular regard to production personnel, for whom the use of Personal Protective Equipment (PPE) provided by the Company is compulsory.

The supervisors are entrusted with verifying the correct application of safety regulations.

4.1.2 Application of behavioural norms in relations with stakeholders

In managing relationships with stakeholders, Lineamec Srl ensures the following behavioural guidelines in the field of human resources:

- Enhancement of human resources, with definition of clear roles and precise levels of responsibility;
- Flexibility of working hours, with the possibility of part-time and other agreed modalities;
- Use of holidays and permits within the limits provided by the applicable National Collective Labour Agreement (NCCLA);
- Exceptional granting of requests for economic assistance, such as advances on severance pay;
- Promotion of corporate welfare initiatives;
- Organisation of periodic meetings with the designated personnel to share objectives, programmes and corporate results;
- Adoption of tools aimed at promoting internal communication;
- Recruitment of persons belonging to protected categories, in compliance with legal limits;
- Respect for the provisions contained in the "Risk Assessment Document", in accordance with Legislative Decree no. 81/08 and subsequent amendments.

Lineamec Srl further declares that it:

- does not use child labour, meaning employment of persons under 16 years of age or still subject to compulsory schooling;
- does not use or exploit any form of forced labour, defined as any work or service obtained under threat of any penalty and not offered voluntarily by the person;
- has provided work environments, equipment, machines and installations in compliance with current legislation, in order to protect the health and safety of workers and any third parties involved;
- respects the right of all personnel to join trade unions and/or to conduct collective bargaining, where provided;
- does not implement or favour any form of discrimination based on religion, race, political or spiritual belief;
- does not use disciplinary practices other than those provided for by the NCCLA for workers in the small and medium-sized metal-mechanical industry and by current legislation;
- respects the provisions of the relevant NCCLA in respect of working hours;
- complies with the NCCLA and company bargaining in respect of remuneration.

• **Relations with customers**

In conducting business relationships with customers, Lineamec is guided by the principles of legality, fairness and correctness.

The Company produces and markets exclusively products that protect customers, ensuring that they are:

- compliant with sector directives on safety;
- subject to rigorous quality controls to ensure correct use;
- aligned with environmental regulations, with particular attention to product recovery and end-of-life cycle;

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- accompanied by all necessary information and certifications.
Lineamec refrains from giving or promising gifts, donations or other benefits that go beyond normal commercial customs. Similarly, it is forbidden for customers to offer gifts or benefits of any nature to the Company's employees or their family members, if such gestures may improperly influence their behaviour, creating a conflict with the Company's interests, including moral ones.
Customers are also encouraged to report any improper conduct involving the personnel of both parties.

• Relations with suppliers

Lineamec Srl undertakes to require its suppliers and external collaborators to respect behavioural principles aligned with those of the Company, recognising such compliance as fundamental for establishing and maintaining long-lasting and transparent business relationships.

Each supplier, commercial partner or external collaborator must be informed of the existence of the Code of Ethics and the related commitments.

The selection of suppliers and the definition of purchasing conditions are based on an objective evaluation that takes into account quality, price and the ability to provide goods and services in line with the company's standards.

The fundamental requirements for Lineamec are:

- establish business relationships based on transparency and correctness;
- request, where necessary, certifications in the areas of quality, environment and safety;
- demand compliance with international and regulatory standards in respect of human rights and the workers employed in the production units.

Employees who maintain relationships with suppliers must refrain from receiving gifts or advantages of any nature, except those of symbolic value and consistent with normal commercial customs.

Suppliers are required to operate in full compliance with current regulations in respect of contracts, contributions, safety and hygiene at work, as well as environmental protection, and must not employ child labour or non-consensual labour.

It is also forbidden for suppliers to offer gifts or benefits to the Company's employees or their family members if such gestures may improperly influence the behaviour of the personnel, in contrast with the interests, including moral ones, of Lineamec Srl.

Suppliers are encouraged to report any incorrect behaviour concerning the personnel of both parties.

Finally, where possible, Lineamec has activated on-site audits for suppliers in order to verify the actual compliance with regulatory and contractual requirements.

• Relations with public authorities and entities performing public functions

In the course of its activities, should Lineamec enter into relationships with Institutions, Entities or Public Enterprises, as well as with persons exercising public functions or providing public services, the Company ensures full respect for the principles of correctness, transparency and cooperation, as well as strict compliance with laws and applicable regulations. In dealings with public bodies, Lineamec refrains from granting or promising gifts, donations or other benefits that go beyond normal customs. In particular, employees are required not to offer, promise or deliver money or other benefits that may influence the performance of duties by a public official or a person in charge of a public service.

The Company also undertakes not to adopt fraudulent behaviour aimed at obtaining contributions, subsidised loans, grants or other disbursements from public bodies. Should it receive such resources, Lineamec allocates them exclusively to the purposes provided for, respecting conditions and methods of use.

With regard to sponsorships and contributions, Lineamec may provide donations to duly-established entities, such as non-profit associations, that promote ethical principles shared by the Company, supporting initiatives of a social, scientific, cultural, sports or artistic nature.

The selection of the initiatives to support is always carried out respecting transparency and with the aim of avoiding any possible conflict of interest, both personal and corporate.

• Administration, accounting and finance

Lineamec guarantees strict compliance with procedures aimed at planning, regulating and controlling the management of the Company's financial resources.

The Company carefully maintains orderly, complete and preserved documentation relating to its administrative-accounting activities. Accounting is managed in full compliance with the accounting regulations and procedures laid down by regional and sector legislation.

Lineamec observes all rules, principles and procedures necessary to ensure a correct and complete representation of the

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Company's economic, asset and financial position.

The Company ensures the truthfulness, correctness and completeness of financial statements, reports, corporate communications, schedules and any other documentation relating to its economic, asset and financial conditions. Furthermore, Lineamec refrains from any conduct that may hinder supervision activities, controls and audits required by law or by control bodies.

5. IMPLEMENTATION OF THE CODE OF ETHICS

Each employee must accept and comply with the commitments set out in this Code of Ethics from the moment of the establishment of the employment relationship, at the first dissemination of the Code or on the occasion of any significant amendments or additions.

In particular, employees are obliged to:

- refrain from behaviours contrary to the rules contained in the Code;
- refer to the company contacts for clarification on the application of the rules;
- promptly report to the company contacts any possible violation of the Code of Ethics, whether they have become aware of it directly or via others, as well as any request for violation received;
- properly inform the third parties with whom they come into contact in the course of their work activity of the existence of the Code and of the commitments and obligations imposed on external parties;
- use IT tools made available exclusively for business purposes, in compliance with applicable regulations and internal procedures, avoiding any personal or private use;
- correctly store and archive documents relating to work activity;
- not destroy or arbitrarily modify company documents; in case of doubt on the treatment or storage of documents, refer to the competent functions.

Moreover, employees are responsible for:

- protecting the company assets assigned and safeguarding them with diligence, preventing their use by unauthorised persons, adopting responsible behaviours and in compliance with company procedures;
 - requiring compliance with their obligations relating to their work activity.
- Lineamec Srl condemns any unlawful conduct in relation to IT systems, including: the use of unauthorised or unlicensed software, the forgery of public or private electronic documents, unauthorised access to computer or telematic systems, the possession or dissemination of access codes, the interception, blocking or illicit interruption of computer or telematic communications.

In case of a verified violation of the principles and rules contained in the Code of Ethics, the Company will promptly adopt appropriate disciplinary measures, in accordance with what is provided by the applicable National Collective Labour Agreement.

A violation of the Code of Ethics by employees, collaborators, suppliers or customers may constitute a contractual breach, with all legal consequences, including termination of the contract or assignment and possible claim for damages.

6. FINAL PROVISION

This Code of Ethics is approved by the Management of Lineamec Srl, which ensures its adoption and implementation within all company structures.

The Code represents a binding document for all addressees — employees, collaborators, consultants, suppliers, customers and, more generally, all persons who act in the name of and for the Company. The knowledge and observance of its provisions constitute an integral part of the contractual obligations assumed by each person towards Lineamec Srl. Any amendments, updates or additions to this Code are exclusively the responsibility of the Management, which will formally approve them. Such changes will be promptly communicated to all addressees, through the company communication tools deemed most appropriate, in order to ensure their full and conscious application.

The Code of Ethics can be consulted in digital format on the corporate network and, where necessary, may also be provided in paper copy. The Company periodically promotes awareness-raising and training activities on the content of the Code, to strengthen its dissemination and operational effectiveness.