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ETHICAL CODE

COGEME ITALY SRL

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THE COGEME ITALY S.R.L. CODE OF ETHICS

1. VALUE AND PURPOSE OF THE CODE OF ETHICS

. This Code of Ethics (below, the "Code") was adopted by Cogeme Italy S.r.l. (below, also just the "Company") by formal approval with a resolution of the Board of Directors on March 25, 2021

The Code identifies and collects the ethical principles and values of Cogeme Italy S.r.l. which must inspire, beyond and regardless of the provisions of law, the conduct and behavior of those who work with the Company, both inside and outside the company organization.

The Code aims to ensure that all those who work for Cogeme Italy S.r.l. act in compliance with the laws and principles pursued by the Company in carrying out their business, in order to create a work environment inspired by high ethical standards and conduct.

The Code of Ethics also introduces and makes binding the principles and rules of conduct relevant to the prevention of the crimes indicated in the Legislative Decree June 8, 2001 n. 231, regarding the administrative liability of entities. The Code of Ethics therefore constitutes, a fundamental component of the "Organization, Management and Control Model" adopted by Cogeme Italy S.r.l. for the prevention of the offenses referred to in the aforementioned Decree.

The rules of the Code bind the behavior of anyone who has a relationship with the Company, for whatever reason.

It is the duty of all recipients, as better listed below, to know the content of this Code, understand its meaning, observe and enforce the principles within the scope of their functions and responsibilities.

In no way the conviction of acting for the benefit of Cogeme Italy S.r.l. can justify the adoption of behaviors in contrast with the principles established by the Code.

Compliance with this Code is part of the duties of each of the recipients and the violation of the rules contained in it is a source of responsibility for them.

The rules of the Code prevail over any instructions to the contrary given by the internal hierarchical organization.

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The tasks of supervising compliance and updating of the Code, proposing possible improvements to the provisions of the Code and clarifying any interpretative doubts, are entrusted to the Supervisory Body in the capacity of Guarantor.

2. RECIPIENTS

The rules of this Code apply, without exception, to the managers, employees, collaborators, consultants, directors and mayors of the Company and to all those who, directly or indirectly, permanently or temporarily, establish relationships with the Company in any capacity, relationships and collaboration however denominated, or operate in the interest of the same and, more in general, to all those who come into contact with the Company, even if they have autonomous interests, including customers and suppliers and all those who cooperate temporarily or permanently, for any reason, to pursue the purposes of the Company in the context of the various relationships they have with it (below also referred to as "Recipients").

All Recipients, without exception, conform their conduct, within the scope of their responsibilities, to the principles set out in this Code, contributing to its implementation and dissemination.

The Company undertakes to disseminate this Code to all Recipients, with all the means it deems appropriate, through specific and adequate communication and dissemination activities.

For this purpose, a copy of this Code will always be available for consultation on the company bulletin board where it will remain permanently posted for the entire duration of its validity.

A copy of the Code will be delivered to each worker, collaborator and administrator at the time of the establishment of the relationship.

The Company also intends to make the Code available on the company web page.

GENERAL PRINCIPLES

3. GUIDING PRINCIPLES OF COGEME ITALY SRL.

Cogeme Italy S.r.l. in carrying out its business it complies with the following principles:

Legality and honesty:

The Company carries out its activities in full compliance with constitutional principles, laws, customs and commercial practices and, in general, with all applicable national and international regulations.

All the recipients of this Code must adopt a correct, honest and loyal behavior, both in internal and external relationships, avoiding pursuing illicit or illegitimate purposes, or in any case operating in situations of current or potential conflict of interest, in view of obtaining an undue advantage, either own or that of third parties.

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Protection of human rights:

Cogeme Italy S.r.l. recognizes the importance of maintaining and promoting Human Rights and respecting the rights of workers.

The Company rejects any form of forced and child labor and any type of verbal, physical, sexual or psychological harassment, abuse, threats or intimidation in the workplace, guaranteeing respectful working conditions that comply with applicable national and international regulations, and with ILO conventions. (International Labor Organization), including in terms of working hours and determination of wages.

Impartiality and non-discrimination:

Cogeme Italy S.r.l. ensures full equal treatment on equal terms, refraining from arbitrary actions that have negative effects on interlocutors or that involve discrimination based on sex, nationality, ethnic origin, language, age, religion, disability, social conditions, sexual orientation and personal or political beliefs;

Professional Diligence:

All the Company's activities must be carried out with commitment and professional rigor, with the duty to provide professional contributions appropriate to the assigned functions and responsibilities and to act in such a way as to protect the prestige and reputation of Cogeme Italy S.r.l. The business targets, the proposal and implementation of projects, investments and actions, must all be aimed at increasing the asset, managerial, technological and cognitive values of the company in the long term, as well as at creating value and well-being for all stakeholders. .

Effectiveness, efficiency and economy:

Cogeme Italy S.r.l. carries out its business according to criteria of effectiveness, efficiency and economy, through the optimal use of available resources, as well as the elimination of waste factors.

Protection of health, safety and the environment:

Cogeme Italy S.r.l. operates in full compliance with health and safety legislation, committing itself to safeguarding the health and safety of employees, suppliers, customers, visitors, consultants and anyone who comes into contact with it.

These commitments are detailed in the Policy for the management of quality, environment and occupational health and safety.

Transparency:

All the actions, transactions and negotiations carried out and, in general, the behaviors put in place in the performance of the work activity are inspired by the utmost fairness, completeness and

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transparency of information, legitimacy under the formal and substantial aspect and clarity and truthfulness of accounting documents in accordance with current regulations and internal procedures.

Confidentiality:

Cogeme Italy S.r.l. undertakes to ensure the confidentiality of the information relating to the Stakeholders and to avoid any improper use of the same information.

4. GIVEAWAYS GIFTS AND BENEFITS

The Company condemns all practices of corruption, illegitimate favoritism, direct and / or indirect solicitation of personal advantages.

No form of offer, bestowal, promise of money or goods or future benefits (by way of example, money, objects, services, favors) of any kind to third parties (with particular reference to public officials, their relatives and similar) that can be interpreted, even if only indirectly, as exceeding the normal manifestations of courtesy allowed in commercial practice or, in any case, having the purpose of obtaining favorable treatments.

The only forms of commercial courtesy allowed are those of modest value, aimed at promoting the image of the Company or initiatives promoted by it, however authorized by the Board of Directors and supported by suitable documentation.

5. CONFLICT OF INTEREST

In the exercise of their own functions, directors, employees and collaborators must not take decisions or carry out activities in potential conflict with the interests of the Company and, in any case, incompatible with their duties.

In order to avoid the arising of conflicts, it is specified that:

- any operation / activity must be undertaken in the exclusive interest of the Company, in a lawful, correct and transparent manner.
- Conflicts of interest between personal (or family) economic activities and the duties held in the company must be avoided.
- it is forbidden to carry out work activities (of any kind and even outside working hours) with customers, suppliers and competitors of the Company.
- personal favors, money or other benefits must not be accepted from persons or companies intending to enter into business relations with the Company.
- any, even apparent, situation of conflict of interest must be promptly reported to the Guarantor.

6. CORRECTNESS AND TRANSPARENCY OF COMPANY INFORMATION

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Each operation and transaction must be correctly executed, recorded, authorized, verifiable, legitimate, consistent and congruous.

In order for the accounting to meet the requirements of truthfulness, completeness and transparency of the recorded data, each operation must be supported by suitable documentation in order to allow checks to be carried out at any time on its characteristics and reasons, as well as the identification of who authorized, carried out, registered, verified the operation itself.

The circulation of information and accounting data for the preparation of the financial statements must take place in compliance with the principles of truthfulness, completeness and transparency.

7. PROTECTION OF COMPANY ASSETS AND USE OF COMPANY ASSETS

Each employee and collaborator is required to work diligently to protect the company assets, safeguarding movable and immovable assets, technological resources and IT supports, equipment, corporate products, information and / or know-how of the Company.

In particular, each employee and collaborator must:

- use company assets according to company policies, strictly observing all security programs to prevent unauthorized use or theft;
- avoid improper use of company assets that may cause damage or reduction in efficiency, or in any case contrary to the interest of the Company;
- maintain the utmost confidentiality on confidential information concerning the Company or the Company's business partners, avoiding disclosure to third parties;
- scrupulously comply with the provisions of the company security policies, also in order not to compromise the functionality and protection of the Informatic systems;
- do not use company software for personal use, nor use the tools provided for private purposes;

Each employee and collaborator is responsible for safeguarding the assets and technological resources entrusted to him and has the duty to promptly inform their direct superiors of events potentially harmful to such assets and resources.

8. PROTECTION OF INDUSTRIAL, INTELLECTUAL PROPERTY AND COPYRIGHT

Cogeme Italy S.r.l. acts in compliance with the industrial and intellectual property rights of third parties, as well as with the laws, regulations and conventions, including within the EU and / or internationally, to protect these rights.

All recipients of this Code must respect the industrial and intellectual property rights of third parties and refrain from unauthorized use of such rights.

In particular, the employees and collaborators of the Company, in the exercise of their activities, must refrain from any conduct that could constitute usurpation of industrial property titles, alteration or counterfeiting of distinctive signs of industrial products, patents, designs or industrial models (national and foreign) as well as refrain from importing, marketing or in any case using or otherwise putting into circulation industrial products with counterfeit or altered distinctive signs or made by usurping industrial property rights.

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All recipients of this Code must refrain from using in an illicit and / or improper way, in their own interest, company or third parties, intellectual property (or parts of them) protected under the legislation on “Copyright”.

9. PROTECTION OF CONFIDENTIALITY AND PRIVACY

Cogeme Italy S.r.l. protects the confidentiality of all information in its possession.

All recipients of this Code and, in particular, employees and collaborators of the Company are prohibited from using information that can be classified as "confidential" for purposes not related to the exercise of their professional activity and / or outside the limits set by the current legislation. The Company also undertakes to ensure that personal data are acquired and processed in accordance with the regulations in force, avoiding improper or unauthorized use, to protect the dignity, image and confidentiality of each data subject.

The processing of personal data takes place lawfully and correctly.

Personal data are collected and stored only if necessary for specific, explicit and legitimate purposes, and for a period of time not exceeding that necessary for the aforementioned purposes.

10. COMPETITION

Cogeme Italy S.r.l. recognizes that fair and loyal competition is a fundamental element for the development of the business.

For this reason, Cogeme Italy S.r.l. bases its competitive ability in the quality of products, in technological and organizational innovation, in the professionalism of its employees and collaborators, respecting the applicable antitrust legislation and the rules of fair competition.

In this regard, the Company opposes any corruptive practice or conduct aimed at violating the rules of freedom and fairness of competition.

11. ANTI-MONEY LAUNDERING

Cogeme Italy S.r.l. undertakes to prevent the use of its economic-financial system for purposes of money laundering, terrorist financing or any other criminal and / or illegal activity by its customers, suppliers, employees, collaborators and in general for all the subjects with whom it relates in carrying out its business.

The Company verifies with the utmost diligence the information available on all counterparties, in order to ascertain their respectability and the legitimacy of their business before establishing any business relationship.

Cogeme Italy S.r.l. abstains from establishing relationships of any kind of subjects believed to be involved in criminal activities of any kind, with particular reference to money laundering.

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12 EXPORT CONTROLS AND ECONOMIC SANCTIONS

Cogeme Italy S.r.l. acts in compliance with laws, customs regulations, export controls and in compliance with existing economic sanctions.

Under no circumstances may sales or other transfers or exports of products, services or technologies be made in violation of applicable export controls, embargoes, economic sanctions or customs laws and regulations.

RELATIONS WITH EMPLOYEES AND COLLABORATORS

13. ENHANCEMENT OF HUMAN RESOURCES

Cogeme Italy S.r.l. is aware that the main success factor of every company consists of the professional contribution of the people who work there, in a framework of loyalty, mutual trust and full cooperation.

Cogeme Italy S.r.l. therefore considers human resources an indispensable element for its existence and for the achievement of its targets.

For this reason, the Company is committed to creating and preserving a work environment that respects the dignity and rights of workers sanctioned by national and community regulations and established by collective agreements, drawing inspiration, in the various phases of the relationship, on compliance with the principles and rules indicated in the following points.

14. STAFF SELECTION

The selection of personnel to be hired is carried out, guaranteeing equal opportunities to all interested parties, based on the correspondence of the candidates' profiles and their specific skills with respect to the needs and requirements of the company.

The information requested during the selection phase is limited to that necessary to verify the correspondence of the requested profile in respect of the candidate's private sphere.

The selection of personnel, based on compliance with the principle of equal opportunities and the recognition of skills, free from any form of favoritism, is aimed at identifying and acquiring valid resources corresponding to the profiles necessary for business needs.

No favoritism, forms of patronage or nepotism are allowed.

Those who select or participate in the selection must not find themselves in situations of potential conflict of interest with the candidate (by way of example only, this situation may occur in the presence of kinship relations between the recruiter and the candidate or, in general, in the presence of any type of personal interest of the recruiter, extraneous and / or in contrast with company needs).

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15. ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP

The staff is hired with a regular employment contract, in compliance with the rules laid down by Italian law and from the community order.¹

No form of irregular work is tolerated, nor is the establishment of employment relationships with people under the minimum age required by international laws and conventions.

16. STAFF MANAGEMENT

Cogeme Italy S.r.l. is committed to developing the aptitudes and potentials of each employee, so that the abilities and legitimate aspirations of individuals are fully realized in the achievement of corporate objectives.

The Company enhances specific skills and promotes the growth of its collaborators.

To this purpose, the Company offers the same career opportunities to those who possess the characteristics required for access to higher functions, positions and / or profiles, without any discrimination and on the basis of merit-based criteria, of acquired professional competence and , however, on the basis of strictly professional parameters.

The management of human resources is inspired by the principles of fairness and transparency, avoiding any form of discrimination.

To this purpose, the Company guarantees the right to equal pay between men and women for the same job.

Cogeme Italy S.r.l. considers staff training and constant updating on specific issues (for example, regarding health and safety at work) an indispensable need for the company.

The Company promotes team spirit and mutual collaboration and expects employees, at all levels, to collaborate in maintaining a climate of mutual respect for the dignity and reputation of each one.

17. ABUSE OF ALCOHOLIC OR DRUGS

Cogeme Italy S.r.l. prohibits each employee or collaborator from making use of alcoholic substances during working hours and before carrying out work; in addition, it prohibits the taking during working hours and / or before working for drugs, hallucinogens or substances that otherwise prevent or hinder the regular performance of work.

In any case, the Company discourages the abuse of alcoholic substances and the use of drugs by each employee or collaborator even outside working hours and regardless of the influence of such conduct on the regular conduct of working activity.

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18. **SMOKE**

Cogeme Italy S.r.l. requires all employees and collaborators to comply with the prohibitions set out in current legislation on smoking.

19. **HEALTH AND SAFETY**

Cogeme Italy S.r.l. undertakes to spread and consolidate a culture of safety by developing awareness of risks and promoting responsible behavior by all employees and collaborators;

The Company also works to preserve the health and safety of workers, especially through preventive actions.

20. **DUTIES OF EMPLOYEES AND COLLABORATORS**

Each employee and collaborator must act loyally and in good faith, respecting the obligations underwritten in the employment contract and ensuring active and intense collaboration, in accordance with the directives of the Company.

Each employee and collaborator is also required to know and observe the rules contained in this Code and in the Corporate Regulations adopted by the Company, basing their conduct on respect, cooperation and mutual collaboration.

All actions, operations, negotiations and, in general, the conduct put in place in the performance of the work activity, must be based on the principles of honesty, correctness

integrity, transparency, legitimacy, clarity and mutual respect, as well as being open to checks and controls in accordance with current regulations and internal procedures.

Employees and collaborators are required to avoid situations in which a conflict may arise between their own interests and those of the Company or which may undermine their ability to make decisions in the best corporate interest and in compliance with the principles of the Code of Ethics.

Each employee and collaborator is required to safeguard the company assets, guarding movable and immovable assets, technological resources and IT supports, equipment, company products, information and / or know-how of Cogeme Italy Srl, also preventing the fraudulent or improper use.

The use of the Company's assets by employees must be functional and exclusive to the performance of company activities or for the purposes authorized by the internal functions in charge.

RELATIONS WITH EXTERNAL PARTIES

21. **RELATIONS WITH SUPPLIERS**

Cogeme Italy S.r.l. bases its conduct in relations with suppliers on the principles of transparency, equality, loyalty and competition.

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In the choice of suppliers and in the formulation of the conditions for the purchase of goods and services, the Company is inspired by the principles of objectivity, competence, economy, transparency, correctness, quality of the good or service and compliance with the relative internal procedures.

In choosing suppliers of goods and services, the Company makes the selection on the basis of documentable evaluation criteria.

Contracts with suppliers must be drawn up in the form prescribed by company procedures and in any case in writing. The remuneration to be paid must be exclusively commensurate with the quality and quantity of the supply provided.

The employees of Cogeme Italy S.r.l. and Management must therefore:

- scrupulously observe the internal procedures relating to the selection and management of relations with suppliers;
- observe and respect, in supply relationships, the applicable legal provisions and the contractual conditions envisaged;
- observe the principles of transparency and completeness of information in correspondence with suppliers;
- not to hinder any supplier in possession of the requisites to compete for a specific supply;
- avoid receiving money or other utility or benefit from suppliers (or anyone other than the Company) for the execution of an act of their office or contrary to official duties;

- avoid giving or receiving, directly or indirectly, gifts, giveaways, hospitality, or other advantages, except for small courtesy gifts or gifts such as those used on anniversaries and holidays.

Employees who receive gifts or other forms of benefit from suppliers that are not directly attributable to normal courtesy relations must take all appropriate steps in order to refuse the gift or other form of benefit and inform their direct superior or the Supervisory Body.

22. RELATIONS WITH CUSTOMERS

Cogeme Italy S.r.l. conforms its conduct in relations with customers to the principles of legality, transparency, correctness, reliability, responsibility and quality.

The employees and collaborators of the Company, therefore, within the assigned tasks, must:

- scrupulously observe all the provisions of law and regulations, the provisions of this Code and the internal procedures relating to the management of relationships with customers;
- provide the customer with all information on the conditions and terms of the contracts relating to the products and services offered, so that the customer is fully aware of them when finalizing the agreement, scrupulously respecting the related company procedures;
- stick to the truth in advertising communications, avoiding any misleading practice;

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- adopt a behavior based on availability, respect, courtesy, in line with the Company's standards, characterized by the highest professionalism;
- to preserve one's independence from both internal and external influences.

In addition, in starting business relationships with new customers and managing existing ones, it is necessary, consider the information available, to avoid:

- entertain relationships with subjects involved in illegal activities, in particular related to the trafficking of weapons and drugs, money laundering and terrorism, the illegal use of labor and, in any case, with people lacking the necessary requirements of seriousness and commercial reliability;
- finance activities aimed at the production or marketing of polluting products for the environment and health;
- maintain financial relationships with those economic activities that, even indirectly, hinder human development and contribute to violating the fundamental rights of the person (for example by exploiting the use of child labor).

23. RELATIONS WITH EXTERNAL COLLABORATORS

Contracts with external collaborators must be drawn up in the form prescribed by company procedures and in any case in writing.

The choice of the collaborator must be made according to the internal selection procedures.

In choosing collaborators, it will be necessary to avoid selecting people and companies whose lack of moral integrity is known.

The remuneration to be paid must be exclusively commensurate with the actual performance performed and the professional skills of the collaborator.

The contracts include the obligation for the collaborator to follow the principles of the Code.

Each employee is required to promptly contact their direct superior or the Guarantor in the event of any violations of the Code by collaborators of the Company.

Collaborators, however named, are required to comply with the principles contained in the Code.

24. RELATIONS WITH PUBLIC ADMINISTRATIONS

The reports of di Cogeme S.r.l. with the Public Administration are inspired by the most rigorous observance of the applicable laws and regulations and cannot in any way compromise the integrity and reputation of the Company.

The assumption of commitments and the management of relations, of any kind, with the Public Administration, are reserved exclusively for the company functions in charge of this and the personnel authorized to do so.

In relations with public entities, the Company's representatives, employees and collaborators must:

- refrain from paying or offering, directly or through third parties, sums of money or gifts of any kind and entity, to compensate or repay public officials or subjects in charge of public exercise or other / different employees of the Public Administration (or other Public Institutions) or their family

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members, of an act of their office or to obtain the execution of an act contrary to the duties of their office (active corruption);

- refuse any request by a public official for money, gifts or services to perform or not an activity planned or facilitated in the context of their employment (passive corruption);
- not to solicit or obtain confidential information that could compromise the integrity or reputation of both parties or that in any case violate the equal treatment and public evidence procedures activated by public institutions or public officials.

The forecasts indicated above must not be circumvented by resorting to different forms of aid and contributions which, under the guise of assignments, consultancy, advertising, sponsorships, entertainment expenses, etc., have purposes similar to those indicated above.

25. ECONOMIC RELATIONS WITH PARTIES, TRADE UNION ORGANIZATIONS AND ASSOCIATIONS

Cogeme Italy S.r.l. does not make contributions of any kind, directly or indirectly, to political parties, movements, committees and political and trade union organizations, both in Italy and abroad, their representatives or candidates, nor does it sponsor congresses or parties that have the exclusive purpose of political propaganda. It also refrains from any direct or indirect pressure on politicians.

SAFETY, HEALTH AND ENVIRONMENT

26. PROTECTION OF HEALTH AND SAFETY AT WORK

The Company favors working conditions that protect the psycho-physical integrity of people, providing workplaces that comply with current health and safety regulations.

To develop and control compliance with the management of Health and Safety at Work, Cogeme Italy S.r.l. makes use of a management system based on the international standard UNI ISO 45001, verified by third party entities.

Each employee and collaborator is required to comply with all applicable safety laws and standards and abide by the Company's policies in cases where these impose requirements that are more stringent than the legal standards.

The sharing of the ethical principles described in this Code, and in particular the fundamental issue of health and safety in the workplace, is intended to be extended and applied to all suppliers and collaborators.

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The Company will take care to assess, before signing a contract, that all the companies working on behalf of Cogeme Italy S.r.l. sign a declaration of commitment to promote and protect the health and safety conditions of their workers, even if they do not work at the company headquarters.

27. ENVIRONMENTAL PROTECTION

The Company is engaged in activities aimed at environmental protection and safeguarding of resources, the containment of energy consumption, research and technological innovation dedicated in particular to the promotion of products and processes increasingly compatible with the environment and characterized by the minimization of risks. environmental.

In order to obtain, document and guarantee compliance with the requirements of the products and services requested by customers and compliance with environmental aspects, the Company has undertaken a program that has its strong point in the application and maintenance of a Company Management System Integrated (Quality, Environment and Safety) which is reflected in the reference standards ISO 9001, IATF 16949 and ISO 1400.

MANAGEMENT OF FINANCIAL RESOURCES AND ACCOUNTING TRANSPARENCY

28. PRINCIPLES OF CONTROL AND ACCOUNTING TRANSPARENCY

The management of financial resources must be carried out in strict compliance with the delegated powers, as well as with any specific authorizations for carrying out particular operations.

Any transaction, understood in the broadest sense of the term, must be legitimate and punctually authorized and recorded.

Accounting transparency is based on the existence, accuracy, completeness and authorization of basic information for the related accounting records.

The members of the board of directors, each employee, collaborator and service provider are required to operate so that the management facts are correctly and promptly represented in the accounts.

For each operation, adequate supporting documentation of the activity carried out must be kept on file, in order to allow:

- easy registration in the accounting;
- the identification of the different levels of responsibility;
- accurate reconstruction of the transaction, also to reduce the probability of interpretation errors.

The Company considers the correctness, transparency and truthfulness of the financial statements and related attached documents as essential and binding values.

All subjects in charge of preparing the data and information contained in the financial statements, reports or other corporate communications required by law are required to verify their correctness / truthfulness.

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All subjects are required to promptly inform their managers of any evidence of omissions, falsifications, negligence in the accounting or documentation on which the accounting records are based with adequate communication channels.

It is forbidden for the Directors of Cogeme Italy S.r.l. engage in any conduct aimed at causing any damage to the corporate assets or damage, even potential, to creditors.

IMPLEMENTATION OF THE CODE

29. ROLE OF THE SUPERVISORY BODY.

The Company undertakes to ensure compliance with the rules of this Code through the institution, in compliance with the provisions of Legislative Decree n. 231/2001, of a Supervisory Body (below "O.d.v.") which is entrusted with the tasks of supervision and monitoring regarding the implementation of the Code, as well as the management of reports.

They compete with the Supervisory Board the following tasks regarding the implementation and control of the Code:

- expressing opinions on the revision of the most relevant company policies and procedures, in order to ensure consistency with the Code;
- verify the application and compliance with the Code;
- monitor the initiatives for the dissemination of knowledge and understanding of the Code, and in particular ensure the development of communication and ethical training activities;
- propose to the board of directors any revision of company policies and procedures with significant impacts on business ethics, as well as any updates, changes and / or additions to this Code.

30. MONITORING AND UPDATING OF THE CODE

Cogeme Italy S.r.l. undertakes to perfect and update - based on the needs that will be encountered - the provisions of this Code.

To this end, the proposed amendments will be subject to prior verification by the Supervisory Body before being submitted to the competent subjects for approval.

The revisions and, in general, any update of this Code must be approved by the Board of Directors of the Company and adequately publicized.

31. OBLIGATION TO REPORT VIOLATIONS

All Recipients must take an active part in promoting the values of the Code.

With this in mind, any Recipient who becomes aware of a violation of the principles of the Code of Ethics and / or the law is required to report it without delay.

To this end, the Company - in respect of privacy and individual rights - has set up specific information channels through which those who become aware of violations and / or non-compliance with this Code can report, directly and confidentially, to the Supervisory Body

Reports can be made by ordinary or registered mail to:

Supervisory Body Cogeme Italy S.r.l.
Via Ferruccio, n. 18 - 03010 Patrica (FR)

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or by e-mail to the address:

odv231@cogemeset.eu

also using the specifically dedicated reporting form and in the manner provided for in the "Procedure for the management of reports and complaints regarding violations of the Code of Ethics" (so-called "Whistleblowing Procedure").

Following the reports received, the Supervisory Body will carry out the related investigations to verify the validity of the reported facts, also making use, if deemed useful and / or appropriate, of the competent functions and will inform the competent bodies for the imposition of disciplinary sanctions.

The Company undertakes to guarantee the anonymity of the whistleblower and to ensure that the same is not subject to any form of retaliation and / or discrimination for reasons related directly or indirectly to the report.

Any personal and sensitive data contained in the report, including those relating to the identity of the reporting party or other individuals, will be treated in compliance with the rules for the protection of personal data and the GDPR Policy adopted by the Company.

No collaborator may be subjected to disciplinary proceedings in the event of incorrect reports made in good faith.

32. EFFECTIVENESS OF THE CODE OF ETHICS AND CONSEQUENCES OF ITS VIOLATIONS

Compliance with the rules contained in the Code must be considered an essential part of the contractual obligations provided for the employees of Cogeme Italy S.r.l., pursuant to Article 2104 of the Italian Civil Code, as well as for the collaborators of the same Company.

The violation of the aforementioned rules will constitute non-fulfillment of the obligations deriving from the employment relationship and a disciplinary offense, with all legal consequences, also with regard to the preservation of the employment relationship.

The Company undertakes to foresee and impose, with coherence, impartiality and uniformity, sanctions proportionate to the respective violations of the Code and in compliance with current provisions on the regulation of employment relationships.

In the event of violations of the Code by employees of Cogeme Italy S.r.l., the Company shall impose the most appropriate disciplinary measures against the perpetrators of the censured conduct, in accordance with the provisions of the collective bargaining applied, in compliance with art. 7 of the law May 20, 1970, n. 300 (so-called Workers' Statute) and current legislation and without prejudice to the right to compensation for any damage suffered. It is understood that all the procedures,

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provisions and guarantees provided for by art. 7 of the Workers' Statute and the National Collective Labor Agreement, on disciplinary measures.

Any violation by external collaborators or suppliers of the rules referred to in this Code will be sanctioned according to the provisions of the specific contractual clauses included in the relative contracts or in the letters of appointment, and may result in the termination of the contractual relationship, without prejudice to any request for compensation, if concrete damage to the Company derives from such behavior.

33. ENTRY INTO FORCE

This Code was adopted by resolution of the Board of Directors on March 25, 2021. and takes immediate effect from that date.