

Code of Conduct



*Document approved by resolution of
Board of Directors meeting of 11 January 2016 and subsequent
implementation of model 231 (Legislative Decree 231/2001) approved in
March 2024*

This Code of Conduct has been drawn up by the Human Resources Management in agreement with the General Management to ensure that the fundamental ethical values of the Eurofork group are clearly defined and constitute the founding element of the policy of conduct of all employees, collaborators and company consultants in the conduct of their business and activities.

The Company undertakes to disseminate the values, ethical principles and rules of conduct contained in this Code, in the manner it deems most appropriate, effective and appropriate.

The Code of Conduct can be consulted on the website www.eurofork.com from which it can be freely downloaded.

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Art. 1. Introduction, general aspects

- This document defines the values, ethical principles and rules of conduct relevant to the proper functioning, reliability, compliance with laws and regulations as well as the image of the Eurofork Group, hereinafter referred to as the "Company" (of which Eurofork S.p.A. is the parent company).
- The document contains the set of rights, duties and responsibilities of the internal and external parties of the Company, beyond and regardless of what is provided for by the law.

Art. 2. Recipients

- All subjects who work to achieve the company's objectives, whether they are employees or collaborators or external consultants, suppliers and business partners, are required to comply with this Code of Conduct in the conduct of business and corporate activities.
- They must behave in a manner consistent with the fundamental principles of honesty, moral integrity, transparency, fairness, objectivity and respect for individual personality in the pursuit of corporate objectives and in all relations with persons and entities inside and outside the Company.
- In no case can the pursuit of the Company's interest justify non-compliant actions and dishonest conduct.
- Consequently, the Company reserves the right not to undertake or continue any type of relationship with anyone who adopts conduct that is contrary to and/or does not comply with the provisions of the Code of Conduct.

Art. 3. Entry into force

- The Code of Conduct was approved on 11/01/2016 by the Company's Board of Directors.

Art. 4. Publication and dissemination of the Code

- The Code of Conduct is published and can be consulted on the [website www.eurofork.com](http://www.eurofork.com) from which it can be freely downloaded.

Art. 5. Updates

- Subsequent revisions of the Code of Conduct are an integral part of the same and do not require new approval. The updating of this Code is delegated to the General Management, subject to the opinion/proposal of the Board of Directors, which ratifies the above at the first available meeting.

Art. 6. Ethical principles and values

- The ethical principles to which the Company adheres and the values that inspire it to guide its strategies, choices and daily actions are defined below.

Legality

- The Company is committed to working in full compliance with the laws and regulations in force in the countries in which it operates. The Company does not implement any conditioning that could in any way influence the statements to be made to the judicial authorities.

Fairness and transparency

- The Company intends to base its relations with all interested parties in compliance with the principles of fairness and transparency, avoiding misleading communications and conduct such as to take unfair advantage of others' positions of weakness and/or lack of knowledge.

Customer orientation

- The Company is oriented towards achieving the satisfaction of its customers by committing itself to establishing extremely loyal and collaborative relationships with them, proposing itself as a reliable partner with over 25 years of know-how in the sector.

Technological innovation

- The Company considers investments in technological innovation to be fundamental and indispensable elements to strengthen its competitiveness and build its future in the more than 30 countries in which it currently operates.

Flexibility

- The Company considers adapting with extreme flexibility to the dynamics of the markets in which it operates as an essential element of its business and a necessary condition for achieving success.

Knowledge Sharing – Best Practices

- The Company encourages team spirit, believes in sharing experiences (Best Practices) and in enhancing human resources through the contribution of each person as a means to achieve their goals.

Enhancement of Human Resources and Gender Equality

- The Company, applying the recognition of the Universal Declaration of Human Rights of the United Nations, recognizes respect for the individual, his dignity and his values as a key element and principle of its identity and its work and repudiates all forms of intolerance, violence and discrimination, whether based on gender, race, nationality, age, political opinions, religious beliefs, sexual orientation, state of health, economic and social conditions.
- The Company adopts the principle of "zero tolerance" towards any form of discrimination or segregation, with particular attention to the distinctions related to the personal characteristics of our employees and collaborators. The protection of the psychophysical integrity and moral dignity of each individual is a priority for the Company, firmly opposing any manifestation of abuse, including harassment and mobbing, in any work environment.
- The Company is committed to guaranteeing and maintaining healthy, serene, safe and functional work environments, allowing everyone to express their human and professional qualities to the fullest.
- The Company guarantees full compliance with national and supranational regulations governing employment relationships.

Merit and equal opportunities

- The Company undertakes to offer the same job opportunities to its employees, collaborators or external consultants and to those who intend to be part of it, and to ensure a system of recruitment, management and development of personnel based exclusively on merit criteria and free of favoritism, facilitations or any type or form of discrimination.

Protection of health and safety in the workplace

- The Company considers the issue of health and safety in the workplace to be of fundamental importance. In this sense, it strives and is committed to ensuring compliance with national and supranational regulations, promoting initiatives aimed at spreading and consolidating the culture of safety in the workplace.

Sustainable development

- The Company places the environment at the centre of its strategies and is committed to operating in compliance with current national and supranational regulations and adhering to a sustainable development model, ensuring all initiatives aimed at ensuring the minimisation of environmental impact, maximum energy efficiency, and the reduction and recovery of waste. the containment of polluting emissions.

Responsibility towards the community

- The Company is committed to promoting a constant relationship of dialogue and collaboration with the local community in which it operates. In this case, it actively collaborates with institutions, schools and universities, forcing, where possible, relationships of mutual and fruitful collaboration.

Art. 7. Criteria of conduct in relations with staff and collaborators

- Human resources are an indispensable factor for the existence, development and success of a company. For this reason, the Company protects and promotes the value and development of human resources, also as an important success factor for the company, so as to promote, on the basis of merit criteria, their full professional realization.
- In the management of relationships that involve the establishment of hierarchical relationships, the Company requires that authority be exercised with fairness and correctness, prohibiting any conduct that may be considered detrimental to the dignity and autonomy of the employee, collaborator or external consultant.
- The working environment, in addition to being adequate from the point of view of health and safety, favors mutual collaboration and team spirit, respecting the moral personality of each one, and is free of prejudice, intimidation, offenses and any conditioning.
- All forms of discrimination must be avoided and in particular any discrimination based on race, nationality, sex, age, disability, sexual orientation, political or trade union opinions, philosophical orientations or religious beliefs towards any subject inside or outside the Company.
- Sexual harassment or acts of physical or psychological violence are not tolerated.
- The Company is committed to protecting the moral integrity of human resources by guaranteeing the right to working conditions that respect the dignity of the person.
- No form of irregular work is tolerated.

Art. 8. Confidentiality and protection of privacy

- The Company pays particular attention to the implementation of the requirements on the protection and protection of personal data provided for by Legislative Decree no. 101/18 and European Regulation 679/2016.
- Upon establishment of the employment relationship, each employee must receive accurate information relating to the characteristics of the function/department to which they belong, responsibilities for their role and tasks to be performed, regulatory and remuneration elements, rules and procedures to be adopted in order not to act through conduct that is contrary to or contrary to the law and company policies.
- Personnel must avoid engaging in or facilitating transactions in conflict of interest, actual or potential, with the Company, as well as activities that may interfere with the ability to impartially make decisions in the best interest of the Company, and in compliance with this Code.
- Personnel, in particular, must not have financial interests in the choice of supplier, in a competing company or customer and may not carry out work activities that may involve the onset of a conflict of interest. For anything not listed above, please refer to the Confidentiality Agreement.

Art. 9. Criteria of conduct in relations with suppliers

- In procurement, procurement and, in general, the supply of goods and services, it is prohibited, on the basis of public information or information available in compliance with current regulations, to establish and maintain relationships:
 - with persons involved in illegal activities, in particular related to the crimes provided for by Legislative Decree 231/2001, and in any case with persons who do not meet the necessary requirements of seriousness and reliability;
 - with subjects who, even indirectly, hinder human development and contribute to a lack of respect for human dignity and to violate the fundamental rights of the person;
 - with subjects who do not comply with the laws in force on labour, with particular attention to child labour, and the health and safety of workers, and more generally with the principles set out in this Code of Conduct.

- It is also forbidden to:
 - to provide services in favour of partners that are not adequately justified in the context of the association relationship established with them;
 - to recognize compensation in favor of external collaborators who are not adequately justified by the characteristics of the task to be performed.
- The relationship with suppliers is based on principles of transparency, loyalty, integrity, confidentiality, professionalism and objectivity of judgment.
The responsible and responsible personnel responsible for the purchasing processes ensure compliance with all relevant regulatory provisions.
- The Company recommends that its suppliers refrain from offering goods or services, (particularly in the form of gifts) to Company employees that exceed normal courtesy practices and also recommends that its employees not offer goods and services, (particularly in the form of gifts) to personnel of other companies or entities that exceed normal courtesy practices.

Art. 10. Criteria of conduct in customer relations

- Fairness, availability, professionalism and competence are the guiding principles and the style of behavior to be followed in relations with customers.
- It is therefore essential that relations with customers are based on full transparency, respect for the law and independence from any form of conditioning, both internal and external.
- Communications to customers must be:
 - clear and simple;
 - compliant with current regulations;
 - compliant with the company's commercial policies and the parameters defined therein;
 - complete, so as not to neglect any relevant element for the customer's decision.
- Under no circumstances is the dissemination of false and tendentious news allowed.
- The Company ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of express and informed authorization and in accordance with the legal regulations in force.
- The Company's employees, collaborators or external consultants are required not to use confidential information for purposes unrelated to the exercise of their activity and not to process the same information in a manner that does not comply with the provisions of the authorizations received.
- All information from interested parties is processed in full compliance with applicable laws on the protection of personal data.

Art. 11. Criteria of conduct in relations with other companies

- The Company and its employees, collaborators or external consultants comply with the principles and rules of free competition and must not violate the laws in force. It is forbidden to engage in any conduct that violates the habitual and free exercise of trade and industry.
- The Company and its employees and collaborators also undertake not to violate the rights of third parties relating to intellectual property and to comply with all the rules for the protection of trademarks and patents.

Art. 12. Criteria of conduct in relations with the public administration

- It is not permitted to offer or promise money, either directly or indirectly or through an intermediary, or to exert unlawful pressure on managers, officials or employees of the Public Administration, or on persons in charge of public service or their relatives or cohabitants in order not to influence an official act or to obtain something in a way contrary to the professional duties of those who perform the public service.

- The only forms of courtesy permitted are referable to and aimed solely at promoting the image of the Company or initiatives promoted by it.
- It is not permitted to omit information or submit false declarations or documents with the aim of obtaining contributions, funding or other disbursements granted by the European Union, the State or a Public Body.
- It is also forbidden to use any contributions obtained for a different purpose for which they were allocated.

Art. 13. Criteria of conduct in administrative, financial and accounting activities

- Every operation and/or economic transaction must be verifiable and legitimate. Consequently, every action and operation must have an adequate record and must be supported by adequate documentation, in order to allow checks to be carried out.
- It is forbidden to prevent or in any way hinder the performance of control activities by the public supervisory authorities.

Art. 14. Criteria of conduct in relations with the judicial authorities

- The Company actively cooperates with law enforcement authorities, law enforcement agencies and any public officials in the context of inspections, controls, investigations and judicial proceedings.
- It is forbidden to exert pressure, of any kind, on the person called upon to make statements before the judicial authority, in order not to make statements or make false statements.
- It is forbidden to help those who have committed a criminally relevant act to evade the investigations of the authority, or to evade the latter's searches.

Art. 15. Criteria of conduct in the use of company assets

- Work tools, documents and any other tangible and intangible asset are the property of the Company and/or at its disposal and must be used exclusively for the achievement of the company's purposes; they cannot be used for non-legitimate uses and must be used and guarded with the utmost diligence of their own property.
- Any illegal use is punishable and possibly prosecuted in accordance with the law.
- The company protects the personal data of all those who work with it, according to the current regulations on Privacy.
- The telematic and IT tools, (telephones and faxes, e-mail, internet and in general the hardware and software provided) as described by a specific procedure, made available to employees or collaborators and consultants, are work tools and consequently company assets.
- These tools must be used for business purposes only. Although marginal to the overall use, their use for private purposes is permitted, it being understood that any offences are also punishable by disciplinary action, regardless of whether they represent conduct that can be prosecuted under the law in force as referred to in a specific internal procedure.

Art. 16. Protection of health and safety in the workplace

- The Company, as an integral part of its business, continuously pursues objectives aimed at improving the safety of workers. In this sense, it undertakes to:
 - disseminate and consolidate a culture of safety and health in the workplace, promoting responsible behaviour on the part of all the human resources employed;
 - carries out training provided at certain times in the company's life;
 - promotes and implements every single activity aimed at minimizing risks and removing the causes that may jeopardize the safety and health of workers.

Art. 17. Sponsorships and donations

- The Company undertakes to sponsor events that have a high charitable value and that are national and/or international in scope and respect the spirit of generosity and prohibits its staff from making donations in order to obtain a service.
- The Company may grant donations to research or care institutes, associations, non-profit organizations of social interest (ONLUS) and/or sports clubs.
- The Company prohibits its personnel from adhering to sponsorship or donation proposals where there may be a possible personal or corporate conflict of interest.

Art. 18. Compliance with the Code of Conduct

- Compliance with this Code by employees, collaborators or consultants must be considered as an integral part of the contractual obligations also on the basis of and for the purposes of art. 2104 of the Italian Civil Code.
- It is also the responsibility of each employee to consult the direct hierarchical report for any clarification relating to the interpretation or application of this Code of Conduct.

Art. 19. Sanctions

- Violations of this Code of Conduct will result in the application of sanctions against the directors, employees, executives of the Company which will be applied in full compliance with the law and the CCNL applicable to the Company.