

CODE OF ETHICS AND CONDUCT
REV 0 OF 02/14/2025

EMMERRE

spare parts for trucks and trailers



YOUR ROAD OUR WORLD!

Ethics and Quality EMMERRE

EMMERRE was founded in 1978 from the idea of its founder, Virginio Marcato. Since then, its mission has always been to fully meet the needs of its partners. Among the company's objectives is the continuous improvement of the quality standards of the products, also through the creation of strong collaborative ties with suppliers and partners. The position we are recognized in our market encourages us to be a benchmark, making our know-how available at both national and international levels. The company, in addition to complying with the laws and regulations in all the countries where it operates, observes high ethical standards in its daily activities. These standards and guiding principles, gathered in this Code of Ethics and Conduct, form the DNA of our company and are directed towards all those who, in different ways, collaborate in achieving the objectives of EMMERRE.



With this code, we formalize our commitment to act with loyalty and integrity, indicating to our employees/collaborators the principles of conduct, values, and responsibilities that must be strictly adhered to.

We pursue: moral integrity, personal honesty, and fairness in internal and external relationships, as well as respect for employees and a commitment to enhancing their professional skills, protecting health, safety, and the environment, and, more generally, rejecting any behavior that, while aimed at achieving a result aligned with the economic interests of the Company, has aspects that are incompatible with the aforementioned fundamental principles.

The code must guide our approach and our daily actions because it is not simply a policy; it is about our responsibilities towards society and the environment. We are committed to respect it together with you.

Two handwritten signatures in black ink, likely belonging to the company's leadership, positioned at the bottom of the page.

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1. Mission

The key points of the company's mission are:

- the correct use of available resources by applying functional control mechanisms, reducing waste and dysfunctions, and enhancing the professional resources available;
- the growth of managerial culture and attention to customer market as a tool to achieve business objectives;
- the involvement of staff through the definition of common and shared goals;
- the continuous enhancement of the product offering in line with the ongoing needs of the market.

As further specified below, the following are reference values for Emmerre Srl

- moral integrity, personal honesty, and fairness in internal and external relationships;
- transparency towards stakeholders and the market;
- respect for employees and commitment to enhancing their professional capabilities;
- the protection of health, safety, and the environment, and, more generally, the rejection of any behavior that, while aimed at achieving a result consistent with the economic interest of the Company, presents aspects incompatible with the aforementioned fundamental principles.



2. Principles of Conduct

The principles listed below are considered fundamental, and therefore EMMERRE Srl commits to respecting them towards everyone. On the other hand, the Company expects that these principles be respected by all parties, both internal and external, who have any kind of relationship with the Company itself.

2.1 Compliance with Laws and Regulations

EMMERRE Srl opera nel rigoroso rispetto della legge e si adopera affinché tutto il personale agisca in tale senso: le persone devono tenere un comportamento conforme alla legge, quali che siano il contesto e le attività svolte. Tale impegno deve valere anche per i consulenti, fornitori, clienti e per chiunque abbia rapporti con la Società. La Società né inizierà, né proseguirà rapporto alcuno con chi non intende allinearsi a questo principio.

2.2 Integrity of Conduct

EMMERRE Srl is committed to producing and delivering quality products and competing in the market according to principles of fair and free competition and transparency, while maintaining proper relationships with public, governmental, and administrative institutions, with the community, and with third-party businesses. Everyone is required to act, in any situation, with integrity, transparency, consistency, and fairness, conducting every business relationship honestly.

2.3 Rejection of Discrimination

In making decisions that affect relationships with its stakeholders (selection of customers, relationships with capital holders, management of personnel and organization of work, selection and management of suppliers, relationships with the surrounding community, and with the institutions that represent it), EMMERRE Srl avoids any discrimination based on age, gender, health status, race, nationality, political opinions, and religious beliefs of its interlocutors.

2.4 Valuing Human Resources

EMMERRE Srl recognizes that human resources are a factor of fundamental importance for its development and, consequently, guarantees a safe working environment that facilitates the fulfillment of this development and enhances

the professional skills of each individual. The work environment, inspired by respect, fairness, and collaboration, must allow for the involvement and empowerment of individuals concerning the specific objectives to be achieved and the methods to pursue them. Human resource management is based on respect for the personality and professionalism of each individual, ensuring their physical and moral integrity. The Company rejects all forms of forced labor or work performed by individuals under the age of sixteen and does not tolerate violations of human rights.

2.5. Authority Equity

In managing contractual relationships that imply the establishment of hierarchical relations, EMMERRE Srl is committed to ensuring that authority is exercised with fairness and correctness and that any form of abuse is avoided. In particular, the Company guarantees that authority does not turn into an exercise of power that undermines the dignity and autonomy of individuals. Such values must always be safeguarded when making decisions regarding the organization of work.

2.6. Health, Safety, and Environmental Protection

EMMERRE Srl intends to conduct its activities and make its investments in a manner consistent with current regulations on the health and safety of workers, according to the guidelines in Chapter 4.8, as well as in a socially responsible and environmentally sustainable manner.

2.7. Fairness in Contractual Matters

Contracts and work assignments must be executed in accordance with what has been knowingly established by the parties: EMMERRE Srl commits to not exploit conditions of poor knowledge or incapacity of its counterparts. EMMERRE Srl has always avoided and will continue to operate in such a way that anyone acting on its behalf seeks to take advantage of contractual gaps or unforeseen events to renegotiate contracts solely to exploit the dependency or weakness of the interlocutor. In particular, when formulating and preparing contractual texts, the Company ensures that the contractor is clearly and understandably informed of the behaviors to be adopted by including specific clauses in contracts that require the counterpart to review and comply with the provisions laid out by the Company (Model and Code of Ethics).

2.8. Competition Protection

EMMERRE Srl intends to safeguard the value of fair competition by refraining from collusive, predatory, and abusive behaviors. Therefore, all individuals operating in the name, on behalf, and/or in the interest of the Company may not participate in agreements that conflict with the rules governing free competition among businesses or that violate the Civil Code or Law 287/1990 and subsequent amendments.

2.9. Investment Enhancement

The Company endeavors to ensure that economic/financial results are such as to safeguard and increase the value of its capital, also to adequately reward the risk taken by its capital holders. EMMERRE Srl also creates the best conditions so that the participation of capital holders in decisions relevant to them is informed: for this purpose, it promotes equality of information and protects the general interest of all capital holders.

2.10. Transparency and Completeness of Information

EMMERRE Srl has always been committed to providing complete, transparent, understandable, and accurate information so that stakeholders can make autonomous and informed decisions regarding the interests involved, alternatives, and significant consequences when establishing relationships with the company.

2.11. Protection of Personal Data

The Company commits to processing personal data and “special categories of data” referred to in Article 9 of EU Regulation 679/2016 of employees, collaborators, and third parties within the limits and in accordance with current privacy legislation. In particular, with specific reference to the General Data Protection Regulation (GDPR), the Company has ensured compliance with the regulatory provisions. Company personnel who, in the course of their work duties, process data, whether “sensitive” or not, must always act in compliance with the aforementioned regulations and the operational instructions provided by the Company.

3. Principles of Conduct for Personnel

Employees, directors, and collaborators must observe the principles listed below in their professional/commercial relationships with the Company.

3.1 Professionalism

Every individual carries out their work activities and services with diligence, efficiency, and correctness, making the best use of the tools and time available to them and assuming the responsibilities related to the tasks assigned.

3.2 Loyalty

Individuals are required to be loyal and operate with a sense of fairness towards the Company. Management must set an example of integrity, transparency, and loyalty while discouraging behaviors that are not in line with company values.

3.3 Honesty

In the course of their work activities, EMMERRE Srl personnel are required to know and diligently comply with the Organization, Management, and Control Model of which this Code of Ethics is an integral part, and with applicable laws. Under no circumstances can the pursuit of the Company's interests justify dishonest conduct.

3.4 Correctness

Personnel must not use for their own purposes any information, assets, or equipment they have access to in the performance of their function or assignment. No individual shall accept or exert, for themselves or others, pressures, recommendations, or reports that could harm EMMERRE Srl of undue offers of money or other benefits.

3.5 Confidentiality

Company personnel ensure maximum confidentiality regarding news and information that constitutes the company's assets or pertains to the Company's activities, in compliance with legal provisions, current regulations, and internal procedures.

3.6 Resolution of Conflicts of Interest

Personnel pursue the general objectives and interests of EMMERRE Srl in the performance of their work activities. Every worker must promptly inform their superiors or relevant contacts of situations or activities where a conflict of interest might arise with that of the Company and in any other case where significant reasons of convenience exist.

4. Conduct Criteria for Organization

4.1 Personnel Selection

The evaluation of personnel to be hired is carried out based on the correspondence of candidates' profiles to those expected and to business needs while respecting equal opportunities for all interested parties. The information requested is strictly related to the verification of aspects provided for in the professional and psycho-attitudinal profile, respecting the candidate's private sphere and opinions.

4.2 Establishment of the Employment Relationship

Personnel are hired with a regular employment contract; no form of irregular work is tolerated. Upon the establishment of the employment relationship, individuals receive detailed information regarding:

- characteristics of the function and duties to be performed and the qualification;
- normative and remuneration elements;
- rules and procedures to be adopted to avoid possible health risks associated with work activities. Such information is presented to individuals in a manner that ensures acceptance of the assignment is based on a genuine understanding of its content.

4.3 Personnel Management

Individuals represent the main resource of EMMERRE Srl, and for this reason, the Company pays particular attention to the enhancement of each individual and professional growth based purely on merit. The Company is committed to safeguarding the moral integrity of individuals, guaranteeing the right to work conditions that respect their dignity. Everyone must be treated with the same respect and dignity and has the right to the same opportunities for professional development and career advancement.

Even in personnel management and development processes, decisions made are based on the alignment between expected profiles and the profiles possessed by individuals (for example, in cases of promotion or transfer) and/or on merit considerations (for example, assigning incentives based on achieved results).

Access to roles and assignments occurs based on skills and abilities; where compatible with overall work efficiency, forms of flexibility in the organization of work that facilitate individuals in a state of maternity as well as those who need to take care of children are encouraged.

4.4 Integrity and Protection of the Individual

EMMERRE Srl safeguards workers from acts of psychological violence and combats any discriminatory attitudes and/or behaviors that may disturb the sensitivity of individuals, committing not to exercise any form of discrimination or harassment against its staff. Those who engage in such acts would incur disciplinary sanctions. All individuals, in the course of their activities and relationships, are required to respect these principles and collaborate with EMMERRE Srl for their protection. Any reports of discriminatory acts (related to age, sexuality, race, health status, nationality, political opinions, religious beliefs, etc.) should be immediately forwarded to their supervisor and the Human Resources manager without fear of retaliation.

4.5 Enhancement and Training of Resources

Managers fully utilize and enhance all professionals present in the structure by activating available levers to promote the development and growth of individuals: for example, job rotation, mentoring by experienced personnel, experiences aimed at covering higher responsibility roles. In this context, it is particularly important for managers to communicate individuals' strengths and weaknesses so that they can strive to improve their skills, including through targeted training. EMMERRE Srl provides individuals with informational and training tools to enhance specific skills and preserve the professional value of personnel. Training is assigned to groups or individuals based on specific professional development needs. Institutional training is provided to individuals at certain moments in the corporate life (for example, new hires are given an introduction to the Company's activities) as well as recurring training aimed at operational staff, including through specific external courses.

4.6 Management of Personnel Activities

Each Manager is required to value the working time of individuals, requesting performances consistent with the exercise of their duties and with the work organization plans. Requesting performances, personal favors, or any behavior that constitutes an abuse of authority is considered an abuse of position.

4.7 Interventions on Work Organization

In the case of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and/or professional retraining actions. EMMERRE Srl adheres to the following criteria:

- the burdens of work reorganization must be distributed as evenly as possible among all individuals, consistent with the effective and efficient exercise of activities;
- in the case of new or unforeseen events, which must be explicitly stated, individuals may be assigned different roles than those previously performed, taking care to safeguard their professional skills.

4.8 Safety and Health

EMMERRE Srl is committed to providing a work environment capable of protecting the health and safety of its personnel, disseminating and consolidating a culture of safety, developing awareness of risks, and promoting responsible behavior by all individuals.

The goal of EMMERRE Srl is to protect human resources, constantly seeking the necessary synergies not only internally but also with suppliers, businesses, and customers involved in the Company's activities. All individuals are required to comply with internal rules and procedures concerning risk prevention and the protection of health and safety, and to promptly report any deficiencies or non-compliance with applicable regulations.

EMMERRE Srl adopts the general measures for health and safety at work prescribed by regulations, particularly with reference to what is prescribed by Article 2087 of the Civil Code and Legislative Decree 81/2008 and subsequent amendments:

- a) assessment of all health and safety risks;
- b) planning of prevention, aimed at a complex that coherently integrates the productive technical conditions of the company;
- c) elimination of risks and, where this is not possible, their reduction to a minimum in relation to knowledge acquired based on technical progress;
- d) compliance with ergonomic principles in organizing work, designing workplaces, selecting equipment, and defining work and production methods to reduce the effects on health of monotonous and repetitive work;
- e) risk reduction at the source;
- f) replacing what is dangerous with what is not, or is less dangerous;
- g) minimizing the number of workers who are, or may be, exposed to risk;
- h) limited use of chemical, physical, and biological agents necessary to perform one's activities in the workplace;
- i) health monitoring of workers;
- j) removal of workers from exposure to risk for health reasons related to their person and relocation, where possible, to another role;
- k) adequate information and training for workers;
- l) adequate information and training for safety managers;
- m) adequate information and training for managers and supervisors;
- n) adequate information and training for worker safety representatives;
- o) adequate instructions for workers;
- p) participation and consultation of workers;
- q) participation and consultation of workers' safety representatives;
- r) planning of measures deemed appropriate to ensure the improvement over time of safety levels, also through the adoption of codes of conduct and best practices;

- s) emergency measures to be implemented in case of first aid, fire fighting, evacuation of workers, and immediate serious danger;
- t) use of warning and safety signals;
- u) regular maintenance of environments, equipment, and systems, with particular regard to safety devices in accordance with manufacturers' indications.

4.9 Environmental Respect

EMMERRE Srl recognizes the importance of environmental respect and wants its activities to be planned seeking the best possible balance between economic initiatives and environmental needs to minimize any negative effects. Everyone is called to act in accordance with this guiding principle.

4.10 Privacy Protection of Personnel

In processing the personal data of its employees, EMMERRE Srl, as mentioned, has adapted to the provisions of GDPR 679/2016. Employees have been provided with information that briefly outlines the purposes and methods of processing, any subjects to whom the data are communicated, and necessary information for exercising the rights recognized by GDPR. Any investigation into the ideas, preferences, personal tastes, and, in general, the private lives of employees and collaborators is excluded. In any case, the Company ensures that the collection and processing of personal data occurs only for determined, explicit, and legitimate purposes, with retention times not exceeding those strictly necessary for the aforementioned purposes. The Company also commits to adopting suitable and preventive technical and organizational measures to ensure the security of all databases, whether owned or third-party, in which personal data of the Company are stored to avoid risks of destruction, loss, dissemination, damage, or unauthorized access or processing.

5. Duties of Personnel

Individuals must act loyally to respect the obligations set forth in the employment contract and what is provided for in the Code of Ethics, ensuring the required performances.

5.1 Diligence of the Employee

Compliance with the provisions of this code must be considered an essential part of the contractual obligations of the Company's employees pursuant to Article 2104 of the Civil Code, according to which "the employee must exercise the diligence required by the nature of the service owed, by the interest of the company, and by that of the national production. He must also observe the provisions for the execution and discipline of the work issued by the entrepreneur and by collaborators of the same to whom he is hierarchically dependent." The principles and contents of this code constitute specific exemplary specifications of the obligations of diligence, loyalty, and impartiality that qualify the correct fulfillment of the work performance and the behaviors that employees must generally maintain towards EMMERRE Srl.

5.2 Confidentiality of Company Information

Company information and know-how must be protected with the utmost confidentiality. The most significant data that EMMERRE Srl acquires or creates during its activities will be considered confidential information and will be treated with adequate attention: this also includes information acquired from and/or concerning third parties (clients, professional contacts, business partners, employees, etc.).

Personnel who, in fulfilling their duties, come into possession of confidential information, materials, or documents must inform their direct superiors. It is the responsibility of "senior" personnel to process and disseminate information appropriately, respecting corporate principles: individuals not expressly authorized to respond to inquiries or provide materials requested by internal or external interlocutors must consult their superiors and comply with the instructions given in this regard.

If it is necessary to address relevant, confidential, or economic matters, care must be taken to have the counterparty sign a confidentiality commitment, drafted according to corporate standards or, alternatively, to adopt necessary measures depending on the nature of the elements being discussed.

Both during and after the termination of the employment relationship with EMMERRE Srl, individuals may use the confidential data in their possession solely in the interest of the Company and never for their own benefit or that of third parties.

5.3 Confidential Information on Third Parties

Personnel of EMMERRE Srl must refrain from using illegal means to acquire confidential information about third-party companies and entities.

Those who, within the framework of a contractual relationship, become aware of confidential information about other subjects must use it solely as provided for in the contract in question. Without proper authorization, individuals cannot request, receive, or use confidential information concerning third parties. If confidential information about another subject is learned that is not already subject to a non-disclosure agreement or other form of protection, it is necessary to consult one's supervisor to receive assistance in handling such information.

5.4 Conflict of Interest

All personnel of Emmerre Srl must avoid situations that may give rise to conflicts of interest and refrain from personally benefiting from business opportunities that they have become aware of in the course of their duties. No individual who has relations with an employee of the Company may improperly benefit from their relationship with that person. By way of example and not limitation, the following situations may create a conflict of interest:

- engaging in a personal activity that competes with those of EMMERRE Srl, even through family members;
- holding a top position (CEO, director, function head) while simultaneously having economic interests with suppliers, customers, or competitors (for example, holding shares of potential competitors, professional assignments, etc.), even through family members;
- managing relationships with suppliers while simultaneously working, even by a family member, for the same suppliers;
- accepting money or favors from individuals or companies that are or intend to enter into business relationships with the Company. If even the appearance of a conflict of interest arises, the individual is required to report it to their supervisor, who will inform the appropriate company function to evaluate the actual presence of the conflict on a case-by-case basis. The individual is also required to provide information regarding activities conducted outside of work if these may appear to conflict with the interests of EMMERRE Srl.

5.5 Gifts.

Personnel of Emmerre Srl are prohibited from accepting or receiving any gift, reward, or other gratuity that has a monetary value greater than symbolic, from suppliers, customers, or other individuals with whom they have a professional relationship. In particular, personnel must not accept gifts and services that may influence the actions to be taken in the performance of their work duties. This cannot be circumvented by resorting to third parties. Personnel of Emmerre Srl who receive gifts or benefits other than those that fall within the permitted categories must inform their supervisor, who will assess their appropriateness and notify the sender of EMMERRE Srl's policy.

5.6 Use of Company Assets

Every individual is required to act diligently to protect company assets through responsible behaviors and in line with operational procedures established to regulate their use, documenting their use precisely. In particular, each person must:

- use with scrupulousness and thrift the assets entrusted to them;
 - avoid improper uses of company assets that may cause damage or reduce efficiency or that, in any case, are contrary to the interests of the Company;
 - adequately safeguard the entrusted resources and promptly inform the relevant units of any threats or damaging events for the Company.
- Regarding IT applications, every person is required to:
- scrupulously adopt the provisions of company security policies, in order not to compromise the functionality and protection of IT systems;
 - refrain from sending intimidating or offensive emails, from using obscene language, or from making inappropriate comments that may offend individuals and/or damage the company's image;
 - refrain from browsing inappropriate and offensive websites, and in any case, those not related to professional activities;
 - refrain from engaging in behaviors that may jeopardize the security, integrity, or usability of data.

5.7 Participation in Antisocial and Criminal Activities

EMMERRE Srl strongly denounces antisocial and criminal processes and activities and declares its firm intention not to have any part in such phenomena. Company personnel are prohibited from engaging in any kind of relationship with organizations and individuals involved in antisocial and criminal activities that threaten society in a broad sense.

6. Relations with Third Parties

6.1 Contratti e comunicazioni ai clienti.

The Company wants to be a reliable and secure partner for its interlocutors and, to this end, is committed to conducting its activities with impartiality, in compliance with contracts and predetermined quality standards, with high professionalism, availability, courtesy, and collaboration, in order to provide its interlocutors with the highest possible level of quality. Contracts and communications with customers must be:

- clear and simple, written in language as close as possible to that normally used by the interlocutors;
- compliant with current regulations, so as not to configure evasive or otherwise incorrect practices;
- complete, so as not to overlook any relevant elements for the customer's decision;
- based on rules of fairness.

6.2 Supplier Selection

The selection of suppliers and external consultants is guided by criteria of competence, cost-effectiveness, efficiency, transparency, and fairness. The purchasing processes must aim for maximum competitive advantage for EMMERRE Srl, granting equal opportunities to suppliers, loyalty, and impartiality: the selection of suppliers and the determination of purchasing conditions are based on an objective assessment of the quality and price of the goods or services, also considering the guarantees of assistance and timeliness of service. Emmerre Srl is committed to preparing all the procedures and actions necessary to ensure maximum efficiency and transparency in the purchasing process, to:

- not exclude anyone, who meets the required qualifications, from competing for contract awards;
- adopt objective and documentable criteria in the selection of candidates;
- ensure sufficient competition in supplier selection procedures;
- establish a separation of roles within the various phases of the overall purchasing process, while also maintaining traceability and documentation of the choices made. The Company reserves the right to request suppliers to attest to the following requirements:
- appropriately documented availability of means, including financial resources, organizational structures, capacity and design resources, know-how, etc.;
- existence and effective implementation, where the Company's specifications require it, of adequate quality

systems. In the selection of professionals and consultants, the selection criterion is one of quality and technical competence.

6.3 Accounting Transparency

To ensure transparency and completeness of accounting information, it is necessary that every operation and transaction is correctly authorized, recorded, verified, and verifiable, legitimate, consistent, and appropriate. All operations must have adequate documentation that allows for checks on the decision, authorization, and execution processes. For each operation, there must be suitable supporting documentation to allow, at any time, for checks regarding the characteristics and reasons for the operation itself.

6.4 Protection of Company Assets

Available resources must be used, in compliance with current laws, the bylaws, and this Code of Ethics, to increase and strengthen the company's assets, protecting the Company itself, the capital holders, employees, creditors, and the market. To guarantee the integrity of capital, it is prohibited, except in cases where the law expressly allows it, to return, in any form, contributions or free shareholders from the obligation to execute them, or to distribute profits not actually achieved or legally allocated to reserves.

6.5 Relations with Public Authorities

The term Public Authority refers to any person, subject, or interlocutor qualifying as a public official or public service officer operating on behalf of the Public Administration, central or peripheral, or public supervisory authorities, independent authorities, community institutions, as well as private partners concessionaires of a public service.

6.5.1 Correctness and Loyalty

EMMERRE Srl intends to maintain relations with the Public Administration with maximum transparency and ethical behavior: such relations, which must occur in compliance with current regulations, are informed by the general principles of correctness and loyalty so as not to compromise the integrity of both parties. Personnel must refrain from any behavior that could harm or condition the impartiality and independence of judgment of the Public Administration. When conducting operations and maintaining relations with the Public Administration, individuals must ensure maximum transparency and traceability of relevant information. Particular caution must be exercised in operations related to tender procedures, contracts, authorizations, concessions, licenses, requests for public funding (state, regional, or community). EMMERRE Srl must not be represented in its dealings with the Public Administration by a consultant or third party when conflicts of interest may arise.

6.5.2 Gifts, Favors, and Benefits

No employee of EMMERRE Srl may provide money or offer economic advantages or other types of benefits to members of the Public Administration to obtain assignments or other advantages, personal or for the Company. No form of gift is allowed that may be interpreted as exceeding normal commercial or courtesy practices, or otherwise aimed at acquiring preferential treatment in conducting any activities related to Emmerre Srl: in particular, any form of gift to Italian and foreign public officials, or their relatives, that may influence their independence of judgment to obtain more favorable treatments or undue benefits of various kinds is prohibited.

A gift is understood to mean any type of benefit: not only goods, but also, for example, free participation in conferences, promises of job offers, etc. This cannot be circumvented by resorting to third parties: in this regard, payments made directly by entities or their employees, as well as payments made through individuals acting on behalf of such entities, both in Italy and abroad, are considered acts of corruption. EMMERRE Srl refrains from hiring as employees or consultants former employees of the Public Administration, or their relatives, who have personally and actively participated in a business negotiation or contributed to endorsing requests made by the company to the Public Administration for a period of at least two years from the conclusion of the business, or from the submission of the request by EMMERRE Srl.

In any case, EMMERRE Srl refrains from practices not permitted by law, commercial customs, or the ethical codes of companies and entities with which it has relations. If a recipient receives explicit or implicit requests for benefits from a member of the Public Administration, they must immediately inform their hierarchical superior or the subject to whom they are required to report, for the adoption of appropriate initiatives.

7. Relations with the Community

7.1 Economic Relations with Political Parties, Trade Unions, and Associations

EMMERRE Srl reserves the right to finance, within the limits of legally permitted amounts, political parties, their representatives, or candidates, and reserves the right to sponsor congresses and festivals that have the exclusive purpose of political propaganda, within the limits of legally permitted amounts. The Company strictly refrains from submitting to any direct or indirect pressure from political representatives: for example, it does not accept referrals for hiring nor enters into consultancy contracts with similar purposes. EMMERRE Srl does not provide contributions to organizations with which a conflict of interest may be perceived (for example, trade unions). However, it is possible to cooperate, including financially, with such organizations for specific projects, respecting the following conditions:

- clear and documented allocation of resources;
- express authorization from the functions assigned within the company.

7.2 Contributi e sponsorizzazioni.

EMMERRE Srl may respond to requests for contributions limited to proposals from entities and associations explicitly without profit motives, with regular statutes and founding acts, that have high cultural or charitable value or that involve a large number of citizens. Sponsorship activities, which may concern social, environmental, sports, entertainment, and art themes, are intended only for events that offer quality guarantees or for which the company can collaborate in the design, ensuring originality and effectiveness. In choosing the proposals to adhere to, EMMERRE Srl pays particular attention to any possible conflict of interests of a personal or corporate nature: for example, family relationships with the interested parties or ties with organizations that may, due to the tasks they perform, somehow favor the company's activities.

8. Application Mechanisms of the Code of Ethics

8.1 Dissemination and Communication

EMMERRE Srl is committed to disseminating this Code of Ethics using available opportunities such as training and information meetings for personnel. Training initiatives may be differentiated according to the role and responsibility of individuals. Company management is available for any clarifications regarding the Code of Ethics. It is the responsibility of everyone, particularly management, to include the contents of the Code in training programs and to reference it in all company procedures, policies, and guidelines.

8.2 Monitoring Compliance with the Code of Ethics

The task of verifying the implementation and application of the Code of Ethics falls on:

- Board of Directors
- Senior personnel of Emmerre Srl

8.3 Reporting Suspected Violations

Anyone who becomes aware of, or has reasonable grounds to believe in the existence of a violation of this Code, any specific law, or company procedures, has the duty to immediately inform their supervisor and/or Human Resources. The report must be made in writing and addressed to the email address: info@emmerre.eu.

EMMERRE Srl implements the necessary measures to protect whistleblowers from any form of retaliation, understood as actions that may lead to discrimination or penalization (for example, termination of relationships with partners, suppliers, consultants, denial of promotions to employees, etc.). The confidentiality of the whistleblower's identity is guaranteed, subject to legal obligations.

The responsibility for conducting investigations into possible violations of the Code of Ethics lies with Human Resources, which may listen to the whistleblower and the responsible party of the alleged violation: personnel are required to fully cooperate with any internal investigations. Following such activities, the Board of Directors will be informed of those behaviors that warrant the application of any disciplinary sanctions or the activation of contractual resolution mechanisms.

8.4 Disciplinary Measures for Violations

The provisions of this Code are an integral part of the contractual obligations assumed by personnel as well as by individuals having professional and/or commercial relationships with EMMERRE Srl. Violations of the principles and behaviors indicated in the Code of Ethics compromise the trust relationship between the Company and the perpetrators of the violation, whether they are directors, employees, consultants, collaborators, clients, or suppliers. Violations will be pursued by EMMERRE Srl as follows:

- regarding employees, through appropriate disciplinary measures, regardless of the possible criminal relevance of behaviors and the initiation of criminal proceedings, in cases where the conduct constitutes a crime. In particular, sanctions will be in accordance with the rules and logic of the applicable employment contract and the Workers' Statute. Disciplinary measures range from warnings or reprimands to suspension without pay, and, in more serious cases, termination. Before any disciplinary action is taken, the affected individual is guaranteed the right to respond;
- with regard to consultants, collaborators, clients, and suppliers, specific methods for resolving the contractual relationship will be activated.

The disciplinary and sanctioning system adopted by the Company, even towards senior personnel, is detailed in the General Part of the Model.

Subject to any compensation for damages that EMMERRE Srl may suffer due to violations by the aforementioned subjects of the provisions contained in the Code of Ethics.

8.5 Operational Procedures and Decision-Making Protocols

All actions and operations of the Company must have an adequate registration and it must be possible to verify the authorization, decision, and execution processes of the operations. For each operation, there must be adequate supporting documentation to enable, at any time, the conduct of checks that attest to the characteristics and reasons for the operation and identify who authorized, executed, recorded, and verified the operation itself.

9. Final Provisions

This Code of Ethics was approved by the Management of EMMERRE Srl on February 17, 2025. Any amendments and/or integrations to this Code of Ethics will be approved by Management and distributed to all the stakeholders.



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