



## COMPANY CODE OF ETHICS

ECOMAVI SRL Unipersonale, registered office in Massa Lombarda, Via Castelletto, 92  
P.IVA 02522990395

### 1. INTRODUCTION

The company ECOMAVI SRL Unipersonale (in the following “Company”) operates on the market with the aim of promoting employment, fostering opportunities for professional growth, creating value for shareholders, satisfying customers and valuing all the people who work for it. This Code of Ethics (in the following “Code”) expresses the commitments and ethical responsibilities in the conduct of business and Company activities undertaken by managers and employees and all those who directly or indirectly establish relations in the name of or in the interest of the Company.

### 2. ETHICAL VALUES

The Company conducts its activities inspired by the principles of fairness, transparency, legality and clarity. All Company activities must be carried out with the utmost scrupulousness, honesty, loyalty and professional commitment, in compliance with laws, procedures, Company regulations and the Code. In particular, the management and heads of Company departments must behave in an exemplary manner towards their staff, promote compliance with the Code and ensure that compliance with the Code is perceived as a substantial part of the contractual bond.

### 3. CONDUCT CRITERIA

3.1 One of the Company's objectives is to create value for shareholders. Communications to shareholders must be truthful, clear, and complete. Behaviour contrary to these principles will be subject to sanctions. Information and communications addressed to shareholders shall be disclosed by top management or persons expressly delegated.

3.2 Relations with external stakeholders: Employees who have business relations with third parties must conduct the relationship in a fair and proper manner. These principles apply to customers, suppliers, consultants and persons carrying out any activity directly or on behalf of the Company.

3.2.1 Relations with suppliers: The selection of suppliers and the formulation of conditions for the purchase of goods and services are carried out on the basis of criteria such as cost-effectiveness, quality and transparency, granting equal opportunities to each supplier. In the event that the supplier, in the performance of its activities, adopts behaviour not in line with the general principles of this Code, the Company shall be entitled to take appropriate measures until the termination of the relationship. In the choice of suppliers, no pressures are permitted that promote one supplier over another. It is not permitted to give or receive in any form, direct or indirect, offers of money or gifts for the purpose of obtaining personal advantages of any kind.

3.2.2 Customer relations: The Company pursues the goal to fully satisfy customer expectations and considers it essential that its customers are always treated fairly and honestly, and is committed to providing its customers with services that meet a similar standard of quality and to periodically monitoring perceived quality.

3.2.3 Relations with Institutions: Relations with institutions, which are necessary for the development of corporate programmes, are reserved exclusively for the corporate functions delegated for this purpose. They are characterised by the utmost transparency, clarity and fairness.

3.2.4 Business relations with the Public Administration: Relations with the Public Administration are managed with the utmost fairness, transparency and rigour. Behaviour that leads to false or ambiguous interpretations is not tolerated.

3.2.5 Relations with political organisations and trade unions: The Company does not make direct or indirect contributions to political parties, movements, political organisations and trade unions, or to their representatives and candidates, except those due under applicable laws and regulations.

3.2.6 External relations: The Company recognises the primary role of clear and effective communication in external relations. Employees entrusted with the external disclosure of Company information, whether in the form of speeches, participation in conferences, publications or any other form of presentation, must comply with Company regulations and receive prior authorisation from top management or a delegated person.

3.2.7 Relations with the mass media: external communication is characterised by respect for the right to information. Communications must be truthful, clear, transparent, unambiguous or instrumental, in line with corporate policies and programmes. Relations with the mass media are reserved exclusively for top management and/or the competent corporate function. Employees shall refrain from issuing formal or informal communications to the outside world for any reason whatsoever and shall take care to communicate to authorised persons and/or the competent function any questions posed by the media.

3.2.8 Gifts and presents: Employees may not, directly or indirectly, offer or receive gifts, money, payments, gratuities of any kind. Gifts are intended solely to promote the corporate image. No form of gift is allowed that goes beyond normal business practices, or in any case aimed at acquiring favourable treatment in the conduct of any activity connected or linkable to the Company. In particular, any form of gift to public officials, auditors, board members, auditors or their family members that may influence their independence of judgement is forbidden.

3.3 Relations with employees: The Company protects and promotes the value of human resources in order to improve and enhance the skills of each employee.

3.3.1 Personnel selection: The Company evaluates the personnel to be hired on the basis of the correspondence between the candidates' characteristics and the profiles required for the Company's needs, in full respect of equal opportunities. It adopts appropriate measures to avoid favouritism, nepotism, or forms of patronage.

3.3.2 Establishment of the employment relationship: The Company hires personnel with a regular employment contract. No form of irregular employment is permitted. At the establishment of the employment relationship each employee receives accurate information on:

- characteristics of the function and tasks to be performed;
- normative and retributive elements based on current legislation;
- workplace safety rules and procedures.

3.3.3 Personnel management: The Company rejects any form of discrimination against its employees. Access to roles and assignments is established, taking into account skills and abilities. To the extent compatible with the Company's level of efficiency, those forms of flexibility in work organisation that facilitate the management of maternity and childcare in general are favoured.

## 4. BEHAVIOUR IN THE WORKPLACE

4.1 Behaviour: Each employee is expected to perform his/her duties responsibly, honestly, diligently and in accordance with Company policies, procedures and directives.

4.2 Mutual respect: The Company promotes an internal climate in which employees interact with full mutual respect.

4.3 Health and Safety: The Company undertakes to manage its activities in full compliance with current legislation on prevention and safety at work and strives to ensure a healthy and safe work environment by taking all necessary measures.

## 5. CONFLICT OF INTEREST

5.1 General principles: The Company bases its relations with its employees on mutual trust and loyalty. Employees must pursue, in the performance of their work, the Company's objectives and interests, avoiding in any way to place themselves in situations that conflict with the Company's interests.

5.2 External work activities: Employees, collaborators, must avoid all activities that are in potential conflict of interest with the Company, with particular reference to personal or family interests that could influence their independence in performing the assigned activities to them with risks on the achievement of the best interests of the Company. Therefore, each employee and collaborator is obliged to report situations of potential conflict of interest.

5.3 Use of inside information: Employees who, in the normal course of their business activities, become aware of confidential information relating to the Company may not use it for personal, private or business purposes. Such uses, in addition to being a moral and ethical issue, are punishable by law.

## 6. VIOLATIONS

In the event of proven violations of the provisions of the Code, appropriate sanctions will be adopted in line with the provisions of national collective labour agreements. Each employee shall report to his or her direct superior any news of violations of the Code. Should direct reference to one's direct superior be deemed unwise for a justified reason or opportunity, it shall be the employee's responsibility and duty to communicate directly with the Managing Director and/or the Board of Directors. All requests will be answered promptly without any risk for the employee to suffer any form, even indirect, of retaliation. Anyone who reports alleged violations of the Code not in good faith will be sanctioned pursuant to it.

## 7. ENTRY INTO FORCE

This Code comes into force upon its approval by the Board of Directors. Any subsequent changes or additions must be approved by the Board of Directors.