



CODE OF ETHICS

APPROVED BY THE BOARD OF DIRECTORS

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Foreword

The business activities of Bottero S.p.A. (hereinafter, also referred to as “**Bottero**” or the “**Company**”) consist in the production of automatic machines for the processing of glass.

Purpose of the document

This Code of Ethics has been drawn up in order to clearly and transparently define the values and principles to which the Company inspires, as well as the criteria of conduct governing its activities. Bottero S.p.A. has prepared this Code of Ethics (hereinafter, the “**Code of Ethics**”), which must be complied with by everyone who, for any reason whatsoever, is involved in its corporate activities.

A positive image and standing are intangible resources essential to the very functioning of the Company and, therefore, indispensable to the fulfilment of the commitments and ethical goals laid down in this Code of Ethics.

This Code of Ethics, although ontologically autonomous, represents an essential component of the Organisation, Management and Control Model *pursuant to* (It.) Legislative Decree. 231/01, which Bottero has adopted to prevent the commission of specific types of offences. We would like to point out that each type of offence included in (It.) Legislative Decree 231/01 is taken into consideration in the Code of Ethics adopted by the Company, which establishes the values and rules of conduct with which each person operating on its behalf must comply. Therefore, these values and rules of conduct are also aimed at avoiding and stigmatising the occurrence of behaviours that abstractly constitute the types of offence that may give rise to administrative liability of entities.

This Code of Ethics is also valid for the ISO 26000 standard on corporate social responsibility. The Code of Ethics, therefore, represents the charter of moral rights and duties that defines the ethical-social responsibility of each participant in the business organisation, which is an instrument that governs relations between the Company and its stakeholders.

1 SCOPE AND RECIPIENTS

Bottero acknowledges the positive ethical value of the principles and code of conduct laid down in the Code of Ethics; it also considers the application of the provisions of this document fundamental and binding to ensure the transparency and legality of all the activities connected in any way to the Company.

The principles and rules of conduct and behaviour described in this Code of Ethics are binding for all Corporate Bodies and their members (Directors and Auditors), for Employees (persons linked by subordinate employment contracts, including management), Collaborators (such as contract workers, interns/trainees and temporary/agency workers), external consultants, suppliers, customers, agents, subcontractors, and any other collaborators, which are any persons acting in the name of and/or on behalf of the Company according to a mandates or other contractual relationships, (hereinafter collectively referred to as the “**Recipients**”).

The Recipients of the Code of Ethics are required to observe the provisions contained therein, and adjust their behaviour and actions to the principles expressed therein. To this end, the Code of Ethics is disseminated as provided in paragraph 11.

2 ETHICAL PRINCIPLES

This Code of Ethics aims to detail the fundamental ethical values of Bottero, such as:

2.1 Legality

The Company considers legality an essential value in the conduct of business activities. It is therefore committed to complying with applicable laws, the Code of Ethics, the internal company regulations, and generally accepted practices.

2.2 Integrity and transparency

All activities performed in the name and on behalf of Bottero must comply with the principles of integrity and transparency and are to be carried out with honesty, a sense of responsibility, fairness, and good faith. The Company is committed to ensuring correctness, completeness, accuracy, consistency, and timeliness in handling and disclosing corporate information, thus avoiding deceptive behaviours from which unfair advantage could be gained.

2.3 Social equity and value of the person

The Company promotes equal opportunities in every area and respects the fundamental rights of people with whom it interacts in any way, protecting physical and moral integrity and guaranteeing equal opportunity.

The Company rejects all forms of torture, physical punishment or inhuman treatment and deprivation of liberty, protecting persons belonging to the protected categories indicated by law (e.g., persons with disabilities or disabilities).

The Company rejects all forms of discrimination based on age, gender, sexual orientation, health status, race, nationality, cultural background, political views, and religious beliefs. In particular, the Company promotes policies for inclusion and rejects any form of propaganda, instigation and/or incitement to discrimination or violence on racial, ethnic, national, or religious grounds based in whole or in part on the denial of the Holocaust or crimes of genocide, crimes against humanity and war crimes, as defined in articles 6, 7, and 8 of the Statute of the International Criminal Court, ratified pursuant to Law of 12 July 1999, no. 232.

In particular, the Company guarantees Employees and Collaborators continuous training and refresher courses, safe and healthy working environments (e.g., through the introduction of ergonomic furniture), and working conditions that respect individual dignity, promoting work-life balance. The Company ensures compliance with the smoking ban within the company and full accessibility of the premises, for example, by breaking down any architectural barrier in compliance with the law and making available spaces dedicated to prayer for different religious faiths. The Company favours maternity/paternity.

2.4 Diligence and professionalism

The members of the Corporate Bodies, the Employees, and the Collaborators are committed to performing their professional services diligently, by acting in the interest of the Company and pursuing objectives of effectiveness and efficiency, with the full awareness, however, that ethics is of primary importance for Bottero and any conduct which, although abstractly aimed at benefiting the Company, is in contrast with the regulations in force or with this Code of Ethics shall not be tolerated.

2.5 Confidentiality

The Company undertakes to treat any information obtained in the course of business within the organisation as confidential, ensuring full and timely compliance with safety and protection measures for the data entered into its information systems and archives.

The processing of personal data, the use of IT, information, and data transmission tools must be characterised by compliance with the principles of fairness, protection of the secrecy of correspondence and privacy, and in such a way as to guarantee the integrity and authenticity of the IT, information, and data transmission systems and of the data processed, to protect the interests of the Company and those of third parties. The Company takes adequate measures to ensure that access to telematic and computerised data takes place in full compliance with the regulations and respect for the privacy of the persons involved and in a manner that guarantees the confidentiality of the information and ensures that it is processed by expressly authorised persons, preventing undue intrusions and violations.

2.6 Environmental protection

The Company is aware of the (direct and indirect) effects of its activities on the economic and social development and on the general well-being of the community, as well as the importance of social acceptance of the communities in which it operates and towards which it promotes corporate voluntary actions, cultural initiatives, the protection of local artistic and cultural heritage, and inclusion, also interacting with local associations and making donations and sponsorships.

Bottero, therefore, plans its activities by seeking a balance between economic initiatives and environmental needs, not only in compliance with current legislation but also in consideration of the rights of future generations.

Bottero is committed to ensuring that projects, processes, methodologies, and materials take into account the development of scientific research and expertise in environmental matters to respect territorial balance, prevent pollution, and protect the environment and the landscape. Bottero favours suppliers who are attentive to environmental sustainability and encourages the creation of a sustainable industrial supply chain.

Bottero undertakes to comply with all laws on environmental and land protection and favours energy efficiency policies, also by resorting to renewable energy and adopting environmental management systems. The use of dangerous products takes place in strict compliance with current regulations. The necessary measures shall be taken to avoid accidents which could harm the community and the environment. In line with the evolution of scientific knowledge on climate change and consistently with its activities, Bottero implements actions to reduce emissions of climate-altering gases released into the atmosphere.

2.7 Customer focus

Bottero considers the customer as the heart of its commercial activities.

In order to meet the demands of customers and create value therefor, the Company is committed to ensuring professionalism, punctuality, courtesy, cooperation, and high-quality standards, providing the highest level of service.

3 RULES OF CONDUCT IN THE MANAGEMENT OF BUSINESS

3.1 General principles

3.1.1 Regulatory compliance

The Company, in carrying out its activities, acts in compliance with local regulations and requests that the Recipients of this Code of Ethics comply with this requirement and engage in behaviours that do not compromise the Company's moral and professional reliability.

The Company ensures full compliance with current tax legislation and applicable *best practices* on the subject, always informing all conduct concerning the receipt, management, and/or issue of tax documentation, including that relating to the import and export of goods from/to non-EU countries, by principles and criteria of maximum caution and prudence.

The Company will not engage, collaborate, or in any way contribute to the conduct of behaviours that, taken individually or collectively, constitute or can constitute, directly or indirectly, the types of offence envisaged by (It.) Legislative Decree 74/2000.

3.1.2 Conflicts of interest

Corporate Bodies, Employees, and Collaborators must ensure that all business decisions are made in the interest of the Company, in line with the Company's principles of correct corporate and business management. They, therefore, must avoid all situations and activities in which a conflict of interest can occur between the personal or family economic activities and duties covered, such that might interfere with or impair their ability to make decisions impartially and objectively (they must, for example, prevent an employee or Collaborator from pursuing an interest other than that of the Company, or being "personally" advantaged by the Company's business opportunities, or pursuing a personal interest using their company role).

The Recipients shall thus avoid any abuse of their position to obtain undue advantages for themselves or others.

Any conflict, even potential, must be promptly communicated in detail to the Company, and the person involved must refrain from performing or participating in any activity that might prejudice the Company or damage its image.

3.1.3 Foresight in commercial transactions

Particular attention is required in commercial transactions for receipt and spending of coins, banknotes, securities, and valuables, in general, to avoid the danger of placing counterfeit or altered values on the market.

3.1.4 Contributions and sponsorships

The Company may agree to requests for contributions and sponsorships for activities concerning social issues, the environment, sports, entertainment, or art, provided they are from regularly established, non-profit organisations and associations having legal Articles/Memorandums of Association.

The Company, in any case, pays particular attention to possible personal or business conflicts of interest in partaking in such initiatives.

Sponsorships can occur only prior definition of specific agreements and verification of the integrity of the beneficiary and the event/initiative promoted.

3.1.5 Confidentiality of information

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 authorisation and compliance with applicable legal standards. It also undertakes to protect the data acquired, stored, and processed as part of the management activity in full compliance with the legal provisions concerning personal data protection.

There shall be no inquiry on the ideas, preferences, personal tastes, and, in general, the private lives of Employees and Associates, as well as other Company collaborators in general. The processing of personal data should, however, be preceded by explicit consent of the party concerned, issued as a result of specific information and in compliance with current legislation.

In particular, Employees, Associates, consultants, and other Company Collaborators are required not to use information acquired in the performance of their duties for purposes unrelated to the strict performance thereof.

3.1.6 Communications with the external environment

In addition to the provisions on confidentiality, the communication and disclosure to the outside world (including through the mass media) of news, information and data concerning the Company shall respect the right to information and shall be reserved exclusively for the corporate functions in charge thereof; under no circumstances shall false or tendentious news or comments be divulged.

All communication activities must comply with laws, rules, and practices of professional conduct and shall be performed with clarity, transparency, timeliness, and accuracy. Any form of pressure or acquisition of favours from the media is prohibited.

In order to ensure completeness and consistency of information, Bottero relationships with the mass media can be maintained exclusively with the coordination of the relevant departments and carried out by a single designated interlocutor.

3.1.7 Prohibition of operations aimed at money laundering

Recipients should never be engaged or involved in any activity which may imply the laundering (that is to say, the acceptance or processing) of proceeds from criminal activities in any form or manner, strictly observing the laws against money laundering.

The Directors, Employees and Collaborators of the Company are required to verify the available information (including financial information) on business partners, consultants, and suppliers in advance, to ascertain their moral integrity, respectability, and the legitimacy of their activities before establishing business relationships with them.

The Company shall always comply with the laws on anti-money laundering and organised crime.

The Directors, Employees, and Collaborators of the Company are required to strictly observe laws, company *policies* and procedures in any business transaction they

undertake even at the intragroup level, ensuring the full traceability of financial inflows and outflows and full compliance with anti-money laundering laws.

3.1.8 Standards of conduct to protect industry and commerce

Bottero intends to protect the values of fair competition by abstaining from collusive and predatory behaviours. The Company and its Collaborators must comply with the principles and rules of free competition and not violate any law on competition, *antitrust*, and consumer protection.

Engaging in any conduct that would violate the usual and free exercise of trade and industry and, as such, may adversely affect the commercial trust and good faith in business is, thus, prohibited.

Within the framework of fair competition and consumer protection, the Company and its Collaborators pledge not to violate third-parties rights relating to intellectual property and to comply with the rules for the protection of distinctive signs of creative works or industrial products (trademarks, patents), putting in place checks in compliance with the regulations for the protection of industrial property rights.

It is forbidden to market products that present the use of signs, figures, or inscriptions bearing false indications sufficient to lead to misunderstanding on the actual origin, source, or quality of the product.

3.2 Customer relationships

The satisfaction of customer demands and the creation of constructive relationships are fundamental objectives for Bottero. The Company is committed to meeting its customers impartially, in compliance with contracts and the pre-set quality standards, with high professionalism, helpfulness, courtesy, and cooperation, to supply them with the highest level of service.

In terms of relationships with customers, Directors, Employees, agents, and Collaborators are required to:

- develop and maintain favourable and lasting relationships with customers based on maximum efficiency, collaboration, and courtesy;
- respect commitments and obligations towards them;
- provide accurate, complete, true, and timely information to allow the customer to make an informed decision;
- notify the existence of this Code of Ethics;
- operate within the existing legislation and request strict compliance;
- specifically meet the provisions of paragraph 4, if customers belong to the Public Administration.

3.3 Supplier relationships

The choice of suppliers and the purchase of goods and services are carried out by specific business functions based on objective evaluations of skills, competitiveness, quality, correctness, respectability, reputation, and price.

The purchasing processes are based on the search for the maximum value for the Company and the granting of equal opportunities to every supplier; they are also based on pre-contractual and contractual conduct required in view of essential and mutual loyalty, transparency, and collaboration.

In any case, assuming that the supplier adopts behaviours that are not in line with the principles of this Code of Ethics in carrying out its activities for the Company, Bottero is entitled to take appropriate measures to preclude any further collaboration.

Bottero suppliers must ensure working conditions based on compliance with fundamental human rights, International Conventions, and the laws in force for their employees. In particular:

- The use of child labour is strictly prohibited and considered unacceptable. The age of production workers cannot be less than the legal minimum age allowed in each Member State;
- the exploitation of child and non-child labour, the use of forced labour, physical or mental abuse, or corporal punishment is considered absolutely unacceptable and will result in immediate termination of any relationships between the supplier and Bottero;
- employee remuneration and benefits must comply with local regulations, with the law, and be in line with the provisions of international conventions on the matter;
- suppliers shall ensure that all forms of production are carried out through work processes that appropriately protect workers' health for the production processes that are used.

Suppliers are also required to inform their subcontractors of the existence of this Code of Ethics.

In relations with customers, Directors, Employees, and Collaborators are required to:

- establish efficient, transparent, and collaborative relationships, maintaining open and frank dialogue in line with best business practices;
- secure the collaboration of suppliers in constantly ensuring the combination of quality, cost, and delivery times;
- require the application of contractual conditions;
- require suppliers to comply with the principles of this Code of Ethics;
- operate within the existing legislation and request strict compliance.

In particular, the execution of a contract with a supplier must always be based on extremely clear relationships, avoiding, wherever possible, forms of dependence. Thus, by way of a non-limiting example:

- as a rule, binding long-term projects with short-term contracts that require continuous renewals with price reviews or consultancy contracts without an adequate transfer of know-how, etc. are avoided;
- it is not considered correct to convince a supplier to enter into a contract which is financially unfavourable to them and induce them to think that a more advantageous contract will be available in the future.

To ensure maximum transparency and efficiency of the purchasing process, Bottero keeps all support documentation for the decisions made in purchase and supply contracts, including all official documentation for tenders for the periods established by law.

3.4 Relations with external consultants, agents, and other collaborators

Given the principles set out regarding relations with suppliers, we specify that, in relationships with external consultants and other associates, the Company's Directors, Employees, and Collaborators are required to:

- carefully assess the opportunity to resort to the use of the services of external consultants and contractors, and select the appropriate professional qualifications and reputations;
- establish efficient, transparent, and collaborative relationships, maintaining open and frank dialogue in line with best business practices;
- secure the collaboration with external consultants and collaborators in constantly ensuring the most convenient price/performance ratio;
- require the application of contractual conditions;
- require external consultants and collaborators to comply with the principles of this Code of Ethics;
- operate within the existing legislation and request strict compliance.

The same principles should be followed for relationships with agents.

4 RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION AND THE GUARANTORS AND SUPERVISORY AUTHORITIES

4.1 Ownership upon taking on commitments

Taking on commitments and managing any kind of relations with the Public Administration, understood in the broadest sense, such as to include the Public Administration of Foreign States, as well as all those individuals that can be qualified as such on the basis of existing legislation and the current doctrinal and legal interpretations, therefore including public officials and those in charge of public service and private bodies in charge of public service, as well as private entities subject to public law, is reserved exclusively for the competent corporate departments and authorised personnel, in strict compliance with the current legal provisions and regulations.

The same requirements apply to relationships with Guarantors and supervisory authorities.

4.2 Ethical rules of conduct

To avoid compromising the Company's integrity and reputation, contact with Public Administration, Guarantors, and Supervisory Authorities must be monitored and documented.

In dealing with the Public Administration, Guarantors, and Supervisory Authorities, the parties involved are bound by maximum transparency, clarity, and fairness to establish maximum professionalism and collaboration relationship.

Towards Public Administration, Guarantors, and Supervisory Authorities officials, the following applies:

- no bribery practices, whether active or passive or collusive behaviour of any kind and in any form whatsoever in the context of relations with such exponents are permitted:
 - for the application and management of authorisations, permits, and/or concessions needed to implement business activities;
 - during assessment and inspection activities;
 - when reporting activities of any kind;
 - in the conclusion of any commercial transaction;
- it is not permitted to offer money or benefits of any kind or perform acts of business courtesy to Italian and foreign Public Administration officials (even in those countries where gifts/benefits are a widespread practice) or their relatives, except in the case of modest value and benefit bestowed in compliance with company procedures and, in any case, with the express authorisation of the CEO and the Company Chairman, and provided that they cannot, in any way, be interpreted as a means to influence them in the performance of their duties (to induce them to act or fail to act in a certain way), to receive illegal favours, and/or gain unfair advantage;
- it is not allowed to be given or promised, to oneself or to others, money or other utility, as the price of one's illicit mediation towards a member of the Public Administration.

5 RELATIONSHIPS WITH OTHER INTERLOCUTORS

5.1 Shareholders, Board of Auditors, auditing firms

The Company is committed to providing its shareholders with accurate, truthful, and timely information and to improving the conditions of their participation in company decisions in full compliance with current legislation and the Articles of Association.

In relations with the members of the Board of Auditors, the statutory auditor, and the independent auditing firm, the parties involved are bound by maximum transparency, clarity, and fairness in order to establish maximum professionalism and collaboration; relationships are established, and information is provided upon prior supervision and coordination by the competent corporate departments.

5.2 Trade associations, trade unions, and political parties

Bottero does not contribute in any way to funding political parties, movements, committees, political and trade union organisations, or their representatives or candidates.

It refrains from engaging in conduct aimed at exerting (direct or indirect) pressure against politicians or in any way attributable to a political-mafia vote-rigging. Bottero can cooperate even financially with non-political associations for specific projects based on the following criteria:

- goals related to the activities of the Company;
- clear and documented allocation of resources;
- express authorisation by the departments responsible for managing said relationships within the Company.

6 DONATION/ACCEPTANCE OF GIFTS OR OTHER BENEFITS

With reference to the anti-corruption purposes, Bottero S.p.A. has deemed it necessary to make this an effective tool in the fight against corruption, flatly opposed by international and internal regulations and also in the light of (It.) Law no. 190 of 6 November 2012 laying down “Measures for the prevention and repression of corruption and lawlessness in the Public Administration”.

The Italian legislature, in fact, implementing a comprehensive reform of the anti-corruption system in compliance with supranational provisions, has provided, together with the introduction of more stringent rules of conduct aimed at reforming the rules for administrative transparency, a system of more punitive sanctions whose effects fall both on natural persons and Institutions.

The Code of Ethics is, therefore, an instrument for implementing the Company policy as it expresses the clear will of the Company to reject corruption and any illegal practice.

No offer or giving, whether direct or indirect, of money, gifts or benefits of any kind to directors, officers or employees of customers, suppliers, external consultants for the purpose of influencing them in the performance of their duties and/or gaining undue advantage, or which may even only be interpreted as exceeding normal business practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any activity connected with the Company, is allowed.

Business courtesies are permitted, provided that they are of low value or such as not to compromise the integrity or reputation of either party or such that they are interpreted by an impartial observer as not aimed at obtaining undue and/or improper advantages.

Directors and Employees are prohibited from accepting, even on festive occasions, for themselves or others, gifts or other utilities, except for gifts of modest value and/or attributable to normal, proper courtesy relations and, in any case, not likely to compromise the integrity or reputation of one of the parties or to be interpreted, by an impartial observer, as aimed at acquiring undue and/or improper advantages.

The Employee who, irrespective of their will, receives gifts or other benefits of modest value and, in any case, in contrast with the above provisions, must give prompt written notice to the Company that may determine the restitution thereof. If this proves impossible, the gift shall be made available to the Company.

The Recipients shall not bestow gifts, donations, or sponsorships whose amount and/or beneficiary does not correspond to what has been formally defined and authorised in compliance with the system of powers and proxies in force at the Company and based on the information contained in the Company procedures.

For the relations with the Public Administration, Guarantors, and Supervisory Authorities, however, refer to the contents and provisions of paragraph 4.2.

The offer or promise of money or other benefit or advantage to participants in sports competitions by entities recognised by the State to achieve a result other than that resulting from the correct and fair conduct of the competition, or commit other fraudulent acts for the same purpose, is not allowed. The abusive exercise of gambling or betting activities is also prohibited.

7 ADMINISTRATIVE AND ACCOUNTING MANAGEMENT

The Company complies with legislation and, in particular, the regulations applicable for the preparation of financial statements and all types of administrative and accounting documentation required.

Accounting records shall be kept in an accurate, complete, and timely manner, in compliance with company accounting procedures, in order to achieve a fair representation of the equity/financial situation and activity of management.

All actions and operations of the Company must be properly recorded, authorised, verifiable, legitimate, consistent, and congruous.

Accounting records are based on generally accepted accounting principles and systematically report the events arising from the management of the Company.

To this end, all business departments are required to ensure maximum cooperation to ensure that operating events are represented correctly and promptly in the company accounts, ensuring the completeness and clarity of the information provided, as well as fairness and accuracy in the data processing.

For each accounting entry that reflects a corporate transaction, adequate supporting documentation must be kept. Said documentation must identify the reason of the operation that generated the record and authorisation. The supporting documentation must be readily available and archived in compliance with appropriate criteria that allow easy reference by both internal and external control bodies.

In particular, internal and external auditors must have free access to the data, documents, and information necessary for the performance of their activities. It is expressly forbidden to impede or obstruct the performance of the control and auditing activity legally assigned to the shareholders, other Corporate Bodies, the statutory auditor, or the independent auditing firm appointed.

8 DILIGENCE IN THE USE OF CORPORATE RESOURCES

The Directors, Employees, and Collaborators are bound to act with the due diligence necessary to protect corporate resources, avoiding improper use, which may cause damage to or a reduction in the efficiency of the Company, or reduce the efficiency of or however be in contrast with the interests of the Company. For the purposes of this principle, company resources include, but are not limited to:

- instrumental goods and consumables owned by the Company;
- business equipment;
- third-party property obtained by concession, loan, or loan for use;
- IT applications and devices for which strict compliance with the company's security *policies* is required to prevent compromising their functionality, processing capacity and data integrity.

The use of company resources (including premises and equipment) is not allowed for personal use or interests of any kind.

Any use of company resources in contrast with applicable laws and regulations and Internal Company Rules is forbidden, even if interest or advantage for the Company results from such use.

9 PROTECTION OF IT TOOLS

Directors, Employees, and Collaborators shall strictly abide by the Company's procedures and *policies* on computer security and internal company regulations. They also shall use company resources - such as, for example, personal computers, telephones and other communication tools - in compliance with the said procedures and *policies*, avoiding any behaviour that could compromise the functionality and protection of the company computer system.

The computer and electronic tools (such as telephones, fax machines, electronic mail, internet, intranet and in general *hardware* and *software*) made available by the Company to its staff are and remain at all times work tools and must be used exclusively for business purposes. This applies both to the use of computers and to the use of other tools, programmes and services. All Employees must act to prevent the possible commission of offences through the use of IT equipment. Company personnel may not load borrowed, unauthorised, or unlicensed software onto company systems and are also prohibited from making unauthorised copies of licensed programs for personal, company, or third-party use.

The Company protects the personal data of all persons who have a relationship with it according to the current laws concerning *privacy*.

It is not allowed to alter the operation of a company's electronic or computer system or any data or information contained therein in any manner, tamper with programmes or archives for any purpose whatsoever, or access an electronic or computer system without authorisation

10 HUMAN RESOURCE MANAGEMENT POLICY

10.1 Human resource selection and recruitment

Evaluation of human resources to be recruited is made based on the correspondence of the candidates' profiles to those expected and corporate needs, in compliance with equal opportunities for all persons concerned. The information requested is strictly related to the verification of the aspects of the professional profile and aptitude, respecting the candidates' private life and opinions.

The function in charge of the selection, within the limits of the available information, takes appropriate measures to avoid favouritism, nepotism, or forms of clientelism in the selection and recruitment phases. All staff involved in the selection process must declare if there are any relatives, blood relatives, or people with whom, for whatever reason, they have had working or personal relationships among the candidates.

10.2 Employment relationship

Staff is hired under a regular employment contract; illegal work is not tolerated. Upon the establishment of the employment relationship, each worker receives accurate information regarding:

- the characteristics of the function and the duties to be performed;
- legislative and remunerative elements, as regulated by the national collective bargaining contract;

- the standards and procedures to be adopted in order to avoid possible health risks associated with the job.

Said information is presented to the employee so that acceptance of the assignment is fully understood.

10.3 Personnel management

Bottero avoids any form of discrimination against its Employees and Collaborators, offering equal opportunities in work and professional advancement. Within the framework of personnel management and development processes, as well as in the selection phase, decisions are based on the correspondence between expected profiles and the profiles possessed by Employees and Collaborators (for example, in case of promotion or transfer) and/or on merit considerations (for example, allocation of incentives based on the results achieved).

Access to roles and positions is also determined in consideration of skills and capabilities; moreover, consistently with the general efficiency of the work, flexibility in the work organisation, which facilitates the management of maternity, paternity, and overall care of the family unit, is favoured.

Staff assessment is carried out in a wider and documented way involving the managers, the human resources department and, wherever possible, persons who have entered into relationships with the person being assessed.

10.4 Protection of occupational health and safety

The Company undertakes to spread and consolidate a culture of safety, developing risk awareness and knowledge of, and compliance with, current legislation on prevention and protection, promoting and demanding responsible behaviour by all Employees and Collaborators - as well as contractors, in their fields of competence - and working to preserve and improve, especially with preventive actions, the working conditions, health, and safety of workers.

The Company's activities must be carried out in full compliance with current legislation on prevention and protection, with particular reference to the provisions of (It.) Legislative Decree no. 81/2008 (and its subsequent amendments and additions) and of the specific applicable prevention regulations; operational management must refer to advanced criteria of environmental protection and energy efficiency, pursuing the improvement of health and safety conditions at work, also - but not limited to - for the purpose of the reasonable prevention of the offences of manslaughter and serious or very serious culpable personal injuries committed with violation of the rules for the protection of occupational health and safety.

The fundamental principles and criteria that guide the Company's decisions concerning occupational health and safety are as follows:

- avoid hazards;
- assess risks that cannot be avoided;
- fight risks at source;
- adapt work to man, in particular as regards the design of employment relations and the choice of work equipment and working and production methods, specifically to alleviate monotonous and repetitive work and to reduce its effects on health;
- adapt to technical progress;

- replace what is dangerous with what is not, or that is to a lesser extent;
- develop a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships, and the influence of factors related to the working environment;
- give priority to collective protective measures over individual protective measures;
- give appropriate instructions to workers.

The Company is also committed to ensuring work conditions that protect the psychological and physical integrity of the workers, respect their moral personality, and avoid the latter being exposed to illegal conditioning or undue distress.

11 DISSEMINATION AND UPDATE OF THE CODE OF ETHICS

Bottero is committed to encouraging and ensuring adequate knowledge of the Code of Ethics, disseminating it to the Recipients through special effective and appropriate information and communication activities.

This Code of Ethics is published on the Company's website. The Company also undertakes to update the content when needs dictated by variations in the context of the reference legislation, the environment, or corporate organisation to make it appropriate and necessary. The Company's Board of Directors is responsible for any amendment and/or addition to this Code of Ethics.

12 MONITORING THE APPLICATION OF THE CODE OF ETHICS

Bottero identifies the Supervisory Board, appointed pursuant to (It.) Legislative Decree no. 231/2001 and in compliance with the provisions of the Organisation, Management and Control Model which the Company has adopted, as the body entrusted with monitoring this Code of Ethics.

This body has the task of:

- monitoring initiatives related to the knowledge and understanding of the Code of Ethics;
- verifying the application of the Code of Ethics, ensuring consistency between the practical conduct displayed by individuals and the principles, norms, and general standards of behaviour set out in this document;
- suggesting any changes, updates, and additions for the revision of the Code of Ethics, to be submitted to the Board of Directors;
- receiving and analysing reports of violations of the Code of Ethics;
- making proposals regarding the possible adoption of sanctions in cases of violation of the Code of Ethics.

For any clarification concerning the interpretation or application of the guidelines referred to in this document, all Company personnel may contact the Supervisory Board.

The violation or suspected violation of the Code of Ethics must be promptly reported to the Supervisory Board in writing, using the email address odv@Bottero.com, or a specific mailbox available at each establishment.

These reports must be sufficiently precise, detailed and traceable to a defined event or area. The Supervisory Board guarantees confidentiality to the authors of the reports to avoid any kind of retaliation, discrimination, or penalty.

The Supervisory Board shall assess the reports received with discretion and responsibility, taking care to investigate, also hearing the person making the report and/or the person responsible for the alleged violation, providing written reasons for any independent decision not to proceed, and notifying the Board of Directors in compliance with the Organisation, Management and Control Model.

13 CONSEQUENCES OF VIOLATING THE CODE OF ETHICS

The rules of conduct defined in the Code of Ethics constitute a basic reference that the Recipients must abide by in their relations with stakeholders, among whom the Public Administration is of pre-eminent importance.

The violation of the provisions of the Code of Ethics also constitutes a disciplinary offence and result in immediate disciplinary proceedings, regardless of whether criminal proceedings have been established in cases where the same conduct also constitutes an offence.

In particular, any breach of the rules of conduct provided for in the Code of Ethics shall authorise the Supervisory Body to request the competent corporate functions of Bottero to initiate a disciplinary procedure that could lead to one of the sanctions listed in the Organisation, Management and Control Model and determined according to the severity of the breach committed and the behaviour adopted before (e.g. any previous breaches committed) and after the fact (e.g. communication to the Supervisory Body of the irregularity) by the author of the breach.