

CORPORATE CODE OF ETHICS

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<i>Elaboration</i>	<i>Checks</i>	<i>Approval</i>
RGQA: Amedeo Daminelli Signature:	DIR / RU : Alessandro Acquaroli Signature:	CEO: Riccardo Moretti Signature:

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1. RECIPIENTS OF THE CODE OF ETHICS

The following are the Recipients of this Code of Ethics adopted by NUOVA SITT S.r.l., who agree to comply with its content:

- Company Directors and Managers (so called key persons);
 - Company employees (so called internal subjects managed by third parties);
- Through specific acceptance or through suitable contractual clauses, the following external subjects may also be recipients of specific obligations in compliance with Code content:
- Collaborators, Consultants and in general all self-employed subjects;
 - Suppliers and Partners (also in form of temporary association of companies).

The adoption of ethical standards of conduct is a moral duty of the Recipients of this Code of Ethics in order to attain the corporate goals based on principles of integrity, transparency, legality, impartiality and prudence, as set forth by national and international laws.

In particular, said Recipients shall:

1. behave in compliance with the Code of Ethics;
2. immediately inform Management of any breaches of the Code, as soon as they become aware of them;
3. request, if necessary, interpretation or clarification on the principles of conduct defined below.

The norms of the Code of Ethics constitute an essential part of the contractual obligations borne by the staff, pursuant to art. 2104 of the Civil Code.

2. INTRODUCTION

NUOVA SITT S.r.l.'s corporate purpose consists in moulding technical items in plastic.

This Code of Ethics expresses the commitment to comply with ethical principles in performing the activities to implement the corporate purpose, and also strictly related tasks. A commitment undertaken by the Company overall and subjects related to it through a service or collaboration agreement, regardless of the nature of the same and regardless of whether these are invested with Body representation powers in relations with third parties.

NUOVA SITT S.r.l., on setting up its internal and external activities in order to comply with the principles set forth by this Code, operates with the belief that the Ethical Values must be pursued as a priority when conducting the corporate activity, and strictly in line with the economic goals indicated in the By-laws.

By adopting this Code, NUOVA SITT S.r.l. focuses on the legitimate expectations of its "stakeholders".

For the purposes of this Code, the term "Stakeholders" refers to all subjects – directors, managers, employees, collaborators, financiers, customers, shareholders, suppliers, partners, Public Administration, etc. - who have significant relations with the company and whose interests are affected in various ways by the Body's activity, in line with their Corporate Policy.

In particular, the relations with those subjects, at all levels, must be based on criteria of legality, uprightness, collaboration, transparency, loyalty and reciprocal respect.

Hence, the Code of Ethics aims to ensure relations of correct cooperation and is a tool adopted independently, destined for general and mandatory application, in order to confer ethical principles embodied by the Company on any corporate activity, intended in the broader sense of the term, binding all Recipients regardless of the nature of their relation with the Body.

The Code of Ethics does not substitute nor prevail other legislative sources and/or internal and external regulations, but is a document that integrates and strengthens the contents, to be

interpreted and applied in line with its principles, with specific reference to the ethical profile of corporate conduct.

To this end this Code of Ethics sets out, by way of examples, the rights, duties and responsibilities of the firm as regards its so-called stakeholders (employees, suppliers, customers, partners, etc.) and the rights, duties and responsibilities of the latter towards the Body, recommending, promoting and prohibiting certain behavior, in compliance with the ethical principles described below, which must be the basis of all corporate conduct.

Therefore, the Code constitutes a series of principles where compliance is critical for regular operations, management reliability and company image and the Company's internal and external operations, behavior and relations must be inspired by them.

The Code of Ethics is structured as follows:

- field of application and recipients;
- general ethical principles, meaning principles to which the Company inspires its operations;
- general rules of conduct, to which the Recipients of this Code of Ethics must abide, in order to implement the ethical principles set forth by this Code;
- rules of conduct in relations with stakeholders which provide an example of the obligations and prohibitions binding the Recipients' activity;
- infringement reporting method and whistleblowing procedure;
- sanctions with a breach of the Code by subjects bound to the Body through a service or collaboration agreement, regardless of its nature.

The firm has adopted a quality management system certified in conformity with ISO 9001 and IATF 16949 standards.

The Company believes that complying with conduct principles based on ethical values is critical for the Company's economic growth, management reliability and image.

This Code of Ethics was processed in order to translate ethical values into behavioral principles that the Recipients shall abide by, in transactions and their activities.

Moreover, the series of principles set forth by the Code of Ethics is essential to prevent illicit behavior set forth by Legislative Decree 231/2001 and formally constitutes an integral part of the organization, management, and control Model.

The Code of Ethics is available in paper and electronic format, at NUOVA SITT S.r.l.'s office.

Management is responsible for making sure that the ethical values and principles of conduct set forth by the Code of Ethics are notified to all Recipients and are understood and abided by, by the latter.

The Recipients must read and make sure they fully understand the content of the Code of Ethics and potential implementing rules that may be provided in support of it.

3. THE ETHICAL VALUES OF NUOVA SITT S.r.l.

In attaining its goals, the Company is inspired by the following values, which are binding for the Recipients of the Code of Ethics:

3.1 Integrity

The Recipients shall adopt professional, responsible conduct in order to avoid situations where potential conflicts may arise, ensuring that their behavior is based on honesty, morality and uprightness.

Staff, in executing its functions, at different levels of responsibility, must not make decisions or perform activities in conflict with Company interests or incompatible with office duties. Directors must also strictly abide by this principle.

3.2 Transparency

Transparency is a critical aspect of all relations held by the Recipients with their interlocutors.

undertaking to provide clear, exhaustive, prompt, and truthful information.

3.3 Legality

The Recipients shall adopt conduct in full compliance with internal procedures and all applicable national and international laws. Management conduct, in particular, must always be correct and fair, as it constitutes reference models for all collaborators.

The Company, as an economic institution, producer of wealth, work, and technology, bars all forms of corruption, malfeasance or other breaches.

3.4 Impartiality

The Recipients shall operate by fully respecting the personal traits of each person, motivating, and rewarding integrity, sense of responsibility, respecting diversities and rejecting any form of discrimination based on age, state of health, gender, religion, ethnic origin, political and cultural opinions, personal or social condition.

The Company undertakes to develop the skills and abilities of its staff, pursuing a policy based on equal opportunities and merits, considering professionalism as a guarantee for the entire community and a condition for attaining its goals.

Therefore, recruiting, selection, hiring and career development are based exclusively on objective evaluations such as work quality, without any sort of discrimination.

3.5 Prudence

The Recipients shall act in full awareness of the risks and aimed at managing them properly. This value translates into cautious behavior, especially if their actions may cause damage to people and property.

3.6 Strategic value of human resources

Human resources are the Company's major asset.

The full involvement of human resources at any level in "team work" and sharing of goals, their protection and promotion allows the Company to always be available to customers, ensuring an effective service to citizens and compliance with the promised requirements.

3.7 Social responsibility

The Company considers its social function as a priority. This consists in offering an essential public service, satisfying the needs of the community and environment in which it operates.

Hence, it undertakes to:

- ensure the constant improvement of workplace safety through technological and organizational innovation, define specific procedures and check their proper implementation;
- protect the health of all the staff in any work environment and condition;
- ensure the citizen's right to environmental protection.

The Company pursues the public interests underlying its activity and the interest of the community and, in general, it makes sure that transactions are based on principles of integrity and transparency.

4. PRINCIPLES OF CONDUCT

When performing corporate activities, the Recipients must comply with the following principles of conduct, based on the aforementioned ethical values.

Under no circumstance, can pursuing the Company's interest or advantage justify dishonest or illicit conduct.

4.1 In relations with customers and competitors

Relations with customers and competitors must be based on integrity, transparency, legality and impartiality.

In particular, the Recipients, through their role in the Company, must respect the customers' needs when executing their activity, abstaining from promoting and favoring their interests and gaining a benefit.

Aware that the quality of the products manufactured and services supplied is the main factor for the company's success, NUOVA SITT S.r.l. undertakes to ensure suitable quality standards based

on pre-defined levels, and to rely on modern auditing and customer satisfaction evaluation methods to foresee corrective and improvement actions; and agrees to always offer feedback to suggestions and claims brought forward by customers and associations protecting the latter, resorting to suitable and prompt communication systems (mail, e-mail, fax, phone, websites).

4.2 In relations with staff

The Company recognizes the key role of human resources, with the belief that the main factor for the company's success consists in the professional contribution of staff, based on loyalty and reciprocal trust.

In addition to training set forth by applicable laws, recurrent training courses are offered to all staff, aimed at developing their skills and abilities, and at fully exploiting the resources in working activities.

With regards to staff management, all employees are guaranteed the same opportunities and fair treatment based on merit criteria, without any sort of discrimination.

The staff is hired with a regular labor agreement, no form of illicit labor is tolerated.

Furthermore, the Company undertakes to protect the moral integrity of staff, preventing the latter from being subject to intimidation or undue discomforts. For this reason, it protects staff from acts of psychological violence and fights any discriminating attitude or behavior or conduct that hinders the person, his/her beliefs and preferences.

Sexual harassment, intimidation and hostile behavior are prohibited in internal or external work relations; and it is prohibited, during the work activity and in workplaces, to provide the service under the effect of alcoholic, psychotropic substances and drugs, or offer psychotropic substances.

4.3 In relations with self-employed workers, suppliers and partners

The Recipients, through their role in the Company, must act in compliance with NUOVA SITT S.r.l.'s ethical values towards self-employed workers, suppliers and partners.

When selecting and managing self-employed workers, suppliers and partners, the Recipients, through their role in the Company, must apply objective, documented criteria, trying to attain the utmost competitive advantage for the Company, based on the quality and price of the goods or service, and ensure or provide assistance, without any discrimination among the potential alternatives, in compliance with applicable laws.

The Recipients must not accept or try to obtain various benefits or advantages from self-employed workers, suppliers and partners, that could influence their judgement during the selection phase.

The Recipients, in specific cases deemed important, must make sure that self-employed workers, suppliers and partners formally accept the commitment to comply with the Code of Ethics, operate in line with the provisions set forth by it and abide by applicable laws concerning safety in workplaces, and abstain from implementing work methods and practices that may result in exploitation, also child labor.

4.4 In relations with public administration

The Company's relations with local, national, EU and international Public Institutions are held exclusively by the Recipients appointed for the purpose, in compliance with applicable laws and based on the Company's ethical values.

The relations with Public Officials or public service officers, bodies, representatives, agents, members, employees, consultants, public officers, Public Institutions, Public Administrations, public and economic bodies, local, national or international bodies or companies are held in the same way.

The Company undertakes to operate in compliance with laws, with utmost transparency and integrity if it takes part in tenders for contributions or subsidies, tenders for contracts or supplies, or in general in requests for services to be provided to the Public Administration.

Without prejudice to all obligations set forth by applicable laws on the subject, the Recipients are prohibited, when relating with Public Institutions or Public Officials - to undertake (directly or indirectly) the following actions:

- review or propose employment and/or business opportunities that could benefit the employees of Public Institutions or Public Officers, at personal level, or imply an advantage for the same;
- offer or in any way supply, accept or encourage gifts, favors or trading practices or behaviors which are not based on the greatest transparency, uprightness and loyalty and are, in any case, not compliant with applicable laws;
- promise or offer to Public Officials, Public Service officers or employees of the Public Administration or other Public Institutions in general, cash, goods or in general, utilities of various nature, in payment for the performance of their official duties, in order to promote and favor their personal or the Company's interests, or obtain services contrary to their official duties;
- solicit or obtain confidential information that could compromise both parties' integrity or reputation or anyhow, that is in breach of equal treatment and public tendering procedures launched by Public Institutions or by Public Officials.

In general, in relations with Public Institutions and the Public Administration, the Recipients must comply with laws and principles of utmost transparency, clarity, correctness to prevent inducing the public subjects with whom the relations are held, to receive partial, distorted, ambiguous or misleading interpretations.

The declarations rendered to Institutions and the Public Administration must be truthful, exhaustive and supported by valid documents in order to ensure proper evaluation by the Public Institution and Public Administration in question.

4.5 In relations with supervisory authorities

The Recipients, through their role in the Company and considering that the latter operates in markets monitored by specific Authorities, undertake, in compliance with values of integrity, transparency and legality, to:

- offer their utmost collaboration when executing checks during any audit, promptly providing the complete documents requested by the auditing staff;
- abstain, in general, from any behavior that hinders the execution of monitoring functions, also during audits by public supervisory authorities (oppose, make spurious refusals, obstructive behavior or failure to co-operate, such as delays in communication or providing documents).

4.6 When processing confidential or sensitive information

Within the sphere of their activities, the Recipients, through of their role in the Company, who may become aware of confidential or sensitive information and data, undertake, implementing values of integrity, transparency, legality and impartiality, to:

- comply with applicable laws on personal data protection and processing;
- in general, abstain from any behavior exploiting sensitive or confidential information, not of public domain, in order to purchase, sell or execute (also through an intermediary) or recommend to others, the execution of transactions on financial instruments; carry out activities or actions that may be in competition with those of the Company.

The Recipients who, through their role in the Company, become aware of confidential information, shall not disclose it to third parties other than for reasons related to their office or for professional reasons, and only with prior authorisation from their manager and compliance with applicable laws.

In general, the Recipients undertake to harmonize their conduct, so that the internal circulation and disclosure to third parties of documents containing confidential information is carefully and meticulously organized in order to avoid prejudicing the company and prevent undue disclosures.

In general, all information that is not of public domain must be considered confidential and be used only to perform the work activity. In particular, the Recipients are prohibited to consult or use confidential data for non-professional purposes.

4.7 With regards to means of information

The Recipients, in force of their role in the Company, agree, implementing values of integrity, transparency, legality and impartiality, to only disclose information to the press and mass media representatives in general, if authorized for the purpose through delegation or formal proxy.

In particular, the Recipients are forbidden to provide collaboration or support of any sort, in an aware manner, in order to:

- publish or disclose false information, or execute simulated transactions or other
- behave in a fraudulent and misleading way, related to the services supplied and financial transactions of the Company, which may alter the Company's value significantly;
- disclose through internet or other means of communication, false or misleading information, rumors or news which provide or are likely to provide false or misleading indications concerning the Company and Group.

4.8 In bookkeeping and communication of economic, equity and financial information

The Company makes efforts to maintain a reliable administrative-accounting system in order to prepare and publish accurate, exhaustive economic and financial data for a clear, truthful and correct representation of management facts, implementing values of integrity, transparency, legality and prudence.

Moreover, the Company sets-up and uses suitable tools to identify, prevent and handle risks of any nature, fraud and illicit behavior.

The Recipients, through their role in the Company, make sure that the accounting records and relative documents are always based on precise, exhaustive, auditable information, and reflect the nature of the transaction of reference in compliance with external obligations (laws and accounting principles), as well as internal policies, regulations and procedures; moreover, they must be supported by the required documents to enable objective controls and analyses.

All the Recipients, involved on any grounds in the preparation of the financial statements and other corporate communications set forth by law, must adopt upright, transparent and collaborative behavior, in compliance with laws and corporate regulations and procedures, in order to provide truthful, accurate information on the Company's financial, economic and equity situation to Shareholders and the financial market in general.

4.9 In managing conflicts of interests

All the Recipients, through their role in the Company, must ensure that every business decision is made in the Company's interest; for this reason, they must avoid any situation of conflict of interest between personal economic activities and tasks or role covered in the Company itself, implementing values of integrity, transparency, legality and impartiality.

If a Recipient is in a situation that may even potentially represent or determine a conflict of interest, he/she shall promptly notify his/her superior in writing in order to verify whether a conflict is indeed present, and to define any resulting action. If directors are involved in these situations, they must notify the Administrative Body and abstain from taking part in the resulting resolution.

4.10 In preserving the corporate assets

During work hours and using work tools, the Recipients cannot perform activities that are not strictly related to their office duties and/or are in conflict with Company interests. In particular, it is forbidden to use corporate tools and resources for illicit scopes or purposes, or for those in contrast with the principles set forth by the Code.

Each Recipient, implementing values of legality and prudence, is responsible for the safety and preservation of the company's tangible and intangible assets entrusted to the same to perform his/her tasks, and to use them appropriately and in line with company purposes.

4.11 In the protection of occupational health and safety and the environment

The Company operates along the entire value chain, pursuing excellent quality levels and paying attention to occupational health and safety, and environmental protection.

To this purpose, the Company, implementing values of legality and prudence, condemns any behavior that may jeopardize the health and safety of people and the integrity and safety of the

environment.

Within the sphere of its activity, NUOVA SITT S.r.l. is inspired by the principle of environmental safety and protection and pursues goals concerning the Recipients' health and safety, through initiatives to attain that purpose.

Therefore, the company's operational choices will be implemented in compliance with specific applicable laws and considering environmental issues.

During the waste collection, transport and disposal activity, all Recipients must strictly abide by sector laws: in particular, it is prohibited to treat or handle waste illegally.

The Recipients of this Code must only perform waste collection and transport activities after obtaining the authorizations established by law. They must deliver waste solely to authorized dumps, after obtaining the relative permit and checking the appropriateness of the waste storage and disposal procedures currently implemented.

The Recipients are forbidden to release false or incomplete declarations about the nature of the waste transported or disposed of or render false declarations with regards to the certifications set forth by law.

Anybody who becomes aware of a breach of the aforementioned rules of conduct shall immediately notify their manager/ superior.

The Company is aware of its role, conferred by law, in guaranteeing the occupational health and safety of its employees.

With regards to occupational health and safety, the essential principles and criteria inspiring all decisions of any type and level, are:

- avoid risks;
- assess risks that cannot be avoided;
- minimize inevitable risks;
- adapt work to available resources, in particular with regards to the constitution of the workforce and • sharing of tasks, choice of work methods and equipment;
- consider technical evolution;
- replace any dangerous activity with a non-dangerous or at least, less dangerous activity;
- plan prevention, meaning a coherent and advanced series of resources, • functionally aimed at protecting subjects who perform their work activity on the premises or anyhow on behalf of NUOVA SITT S.r.l., in line with the Work organization, intended in the broadest sense.
- prioritize collective safety measures compared to individual protection measures, if possible;
- offer training and educational courses suitable for the workers, raising awareness on the observance of legal and technical norms concerning the protection of their health and that of any other subject with whom they come in contact while performing their tasks.

All Foremen and Managers of NUOVA SITT S.r.l., covering key and operational roles, must comply with these principles, in particular when making operational choices and decisions, or during their implementation phase.

The Risk Assessment Document prepared by NUOVA SITT S.r.l., to which reference is made, inspires these principles, and is provided to Workers during training and educational courses, according to the sphere of the competence.

The Recipients undertake to:

- be responsible for their safety and health, and the safety and health of other people in the workplace, who may be affected by their actions or omissions, in line with their training, instructions and equipment provided by the employer;
- be responsible for environmental protection, which could be impacted by their actions or omissions, in line with their training and equipment provided by the employer;
- notify the employer, manager or foreman of any anomalies and/or malfunctioning that arose during use of work equipment and protection devices and, in any case, any potential conditions of danger for personal and third party integrity and for the environment, which they become aware of.

The Recipients, through their role in the Company, undertake not to offer any support, directly or indirectly, to behavior, also of third parties, in breach of the aforementioned principles, nonetheless respecting the organizational autonomy of said third parties.

In particular, the Recipients shall notify potential and obvious situations of risk which they become aware of, to put the Company in the condition to take action quickly, preventing the risk and protecting the corporate image.

5. IMPLEMENTATION METHOD

5.1 Implementation of the Code of Ethics

The Code of Ethics is adopted following the approval of NUOVA SITT S.r.l.'s Managing Director. Any update will be implemented with a resolution, following potential organizational changes within the Company, different external scenarios and based on the experience acquired over time.

5.2 The internal auditing system

The Company diffuses a culture at all levels based on the awareness that audits will be carried out and embodying a mentality focused on auditing tasks.

A positive attitude towards audits by corporate bodies and management at all levels must be promoted, considering the contribution offered by the latter in boosting efficiency.

"Internal audits" refer to all the necessary or useful tools to guide, manage and audit corporate activities, in order to ensure compliance with laws and corporate procedures, safeguard corporate assets, manage activities efficiently and provide accurate and exhaustive accounting and financial data.

All staff, within the sphere of their tasks, is responsible for the definition and proper operation of the internal auditing System through scheduled checks, consisting of auditing activities performed by the single operational units on their processes.

5.3 Implementation system of ethical and control principles

Management aims to:

- facilitate the integration of the ethical values and behavior underlying the company's decision-making processes;
- monitor the compliance of actions and behavior with rules of conduct;
- suggest the review of corporate procedures based on the Code of Ethics and constant updating of the latter.

In particular, Management, in addition to performing audits to monitor the conformity of actions and behavior to this Code of Ethics, also has to:

- clarify the meaning and application of the Code, also through consultancy services;
- establish and spread operational methods through which anybody can notify information on potential breaches of the content of the Code of Ethics;
- review any information received concerning breaches, promoting suitable checks;
- protect those subjects who report illicit behavior against potential retaliation;
- disclose the results of the audits to competent corporate structures to adopt suitable measures;
- elaborate, in agreement with the competent corporate division, staff communication and training programs to improve knowledge on the goals and contents of the Code of Ethics and relative updates;
- evaluate potential needs for amendments/ integrations to the Code of Ethics proposed by collaborators.

6. THE CODE'S APPLICATION MECHANISMS

The Recipients of the Code must report to Management (merely as an example):

- every breach or potential breach of the organization, management and control model and/or Code of Ethics and rules of conduct; reports can be forwarded by explicitly asking to adopt methods to ensure further protection of the privacy of the subject reporting the information, also in an anonymous form;
- measures and/or information received from judicial police bodies or any other authority,

officially disclosed, concerning illicit acts and/or alleged crimes as set forth by Legislative Decree 231/2001 that may affect the company.

6.1. INTERNAL PROBLEM OR SUSPECTED VIOLATION REPORTING AND PENALTY PROVISIONS

Reporting is hereby taken to mean communicating potentially illegal behaviors, either by act or omission, which constitutes or may constitute violation or inducement to violation of laws and/or regulations, values and/or principles set out in the NUOVA SITT Code of Ethics, in its internal auditing principles and its corporate policies and/or norms.

Violations of the norms set out in this Code are punishable with the disciplinary penalties set out in the applicable sector CCNL as well as potential civil or criminal action, depending on gravity.

In cases of proven violations of the Code of Ethics, compliance with which is part of the contractual obligations of the firm's staff and/or those working for it in any capacity whatsoever, disciplinary measures will be taken to safeguard the interests of the firm and pursuant to applicable laws which may lead to the termination of the employment contract and compensation for any damage incurred.

In particular, the breach by Employees of the provisions set forth by the Code foresees infliction of disciplinary sanctions, where foreseen: please note that these will be applied in compliance with laws and the applicable National Collective Labor Agreement, based on single instances and severity of the cases.

Ascertaining the above mentioned infractions, management of disciplinary proceedings and infliction of sanctions are tasks devolved to the competent corporate functions.

In a breach committed by Managers, the Company will evaluate the facts and behavior in question and will take suitable measures with the parties involved in compliance with laws and the applicable National Collective Labor Agreement, keeping in mind that said violations constitute a breach of the obligations set forth by the employment contract.

If the infraction is committed by Collaborators, Consultants or other third parties bound to the Company through a self-employed contract, the Company will terminate the contract in the most serious cases, without prejudice to potential requests for compensation if that behavior caused damage to the Company, also regardless of resolution of the contract.

Anyone gaining knowledge, or having reasonable grounds to believe, that this Code of Ethics, a specific law or corporate procedure has been infringed is duty bound to notify his or her head of department immediately and subsequently the Head of Human Resources.

Such reports must be in writing and in non-anonymous form: NUOVA SITT undertakes to safeguard those reporting from any sort of retaliation, understood as anything which may lead to discrimination or penalization of any sort (e.g. breakdown of relations with suppliers, consultants, etc., denial of promotion).

Reports must be documented and substantiated in such a way as to supply any elements of use and opportune as regards checks on the grounds for the facts reported.

It is especially important that this should include, where such elements are known by the person reporting:

- a) a detailed description of the facts and how he or she found out about them;
- b) date and place in which the events took place;
- c) names of the individuals concerned and their posts or other elements which may help to identify them;
- d) names of any other individuals who may have information on the facts reported;
- e) references to any documents which may confirm the truth of the facts reported.

Such reports must be sent in letter form to the following address: Via Berlino, 44 Verdellino Bergamo 24040 (BG) or by email to the Head of Human Resources. The individual responsible for receiving and examining such reports is the Head of Human Resources. The latter will guarantee confidentiality as regards the identity of the person making such reports, without prejudice to any legal obligations.

Responsibility for carrying out inquiries on potential infringements of the Code falls to the Head of Human Resources who may listen to the person making the report as well as the person responsible for the presumed infringement. Staff are required to co-operate fully with any subsequent internal inquiries. The Head of Human Resources is responsible for notifying General Management of the results of such inquiries and the latter will then decide on the action to be taken.

6.1.1 Whistleblowing process - escalation matrix

PROCESS ACTIVITY	ORGANISATIONAL POSTS				
	EMPLOYEE	HEAD OF DEPARTMENT	HEAD OF HUMAN RESOURCES	MANAGER	
1-Sending in report	R	I	I		
2-Preliminary analysis	C	C	R		
3-Specific in-depth analysis and decisions			C	R	
4-Communication of results		I	R	I	
5-Report filed			R		

KEY: R = Responsible for activity implementation

C = Involved in activity

I = Notified of activity

The personal data (including sensitive data such as ethnic origin, religious and philosophical beliefs, political opinions, membership of political parties and trade unions as well as personal information which may reveal individuals' state of health and sexual orientation) of the individuals making reports and any other individuals involved, which may have been acquired on the occasion of the report, will be treated in full conformity with current legislation on personal data protection and limited to that strictly necessary to inquiries into the truthfulness of the report and its management. Personal data processing is the responsibility of the Head of Human Resources in his or her capacity as data controller (without prejudice to any specific relevant laws) for the sole purpose of implementing the processes set out in this document and thus for the correct management of the reports received in addition to the fulfillment of legal or regulatory obligations in full accordance with confidentiality and fundamental rights and freedoms as well as the dignity of those involved.

The data controlling operations will be entrusted, under the supervision of the Head of Human Resources, to staff duly appointed for the task and specifically trained on whistleblowing procedures with particular reference to safety measures and confidentiality safeguards for those involved and the contents of such reports.

The personal data contained in the reports can be communicated by the Human Resources office to relevant social bodies and internal departments on a case-by-case basis, or the judicial authorities with a view to activating the procedures prompted by the report required to guarantee suitable judicial and/or regulatory safeguards as regards the individual/s reporting where the information gathered and checks carried out make the truthfulness of the events reported clear. In some cases the data may also be communicated to specialist outside elements.

In the course of the activities designed to verify the truthfulness of the reports all measures necessary to protect data from accidental or illegal destruction, loss and dissemination to unauthorized parties will be taken. Furthermore the documents relating to the report will be conserved in both paper and electronic formats for a period of time not exceeding that necessary for the correct finalization of the procedures set out in this document.

No threat, retaliation, penalties or discrimination whatsoever as regards those reporting or reported on will be tolerated nor of those who have co-operated in any inquiries into the truthfulness of the report.

NUOVA SITT reserves the right to take action it considers opportune against anyone taking retaliatory action or threatening such action against those who have made reports in accordance with this document, without prejudice to the rights of such people to protect themselves legally where criminal or civil responsibility by whistleblowers bound up with false declarations or reports has been found.

It remains understood that NUOVA SITT can take whatever disciplinary and/or legal measures it deems opportune to safeguard its rights, goods and image from anyone making false, unfounded or opportunistic reports maliciously and/or in order to slander, defame or cause injury to the individual reported or other individuals cited in the report.

6.2. Reporting of problems or suspected violations via the IATF portal

IATF (International Automotive Task Force) has set up a web system available to all staff to report non-compliances (ethical infringements or serious failures to apply IATF standards) in order to examine these and, where these are well-founded, to take specific action.

Anyone finding out about ethical infringements or serious non-compliance with the 16949 standards (by the organization they work for, a supplier, a certifying body or auditor) can report these on the platform, following this link:

IATF Global Oversight website: <http://www.iatfglobaloversight.org/>.



It should be stressed that this platform is not to be used to manage other matters such as performance failures by suppliers or other problems not regarding ethical and conformity issues. Reports can also be made anonymously and confidentially, as this is managed by a super partes tertiary body (EthicsPoint) but they must be supported by objective proof all the same.

N.B.: you are encouraged to resolve doubts in advance within your own organization, to the Head of Human Resources as described in the previous section.

7. HANDLING OF ORDINARY REPORTS AND WHISTLEBLOWING

Whistleblowing Reports

Pursuant to the law, NUOVA SITT has activated its own whistleblowing reporting channels, as referred to in Legislative Decree no. 24/2023, which guarantee the confidentiality of the identity of the Reporting Person, of the Person involved and of the person in any case mentioned in the Report, as well as the content of the Report and the relevant documentation.

For details of the management of Whistleblowing Reports, please refer to P17.01 - Whistleblowing Management, in the latest revision in force, which constitutes an integral part of this Code of Ethics. NUOVA SITT provides continuous training in terms of Whistleblowing Reports to all company personnel.

Ordinary reports

The following reports fall within ordinary reports and are therefore excluded from the Whistleblowing discipline

- disputes, claims or requests linked to an interest of a personal nature on the part of the person making the report, which relate exclusively to his or her individual work or public employment relationships or which are inherent in his or her work relationships with hierarchically superior figures. By way of example, reports concerning labour disputes or discrimination between colleagues are excluded; such reports shall continue to be sent to the relevant corporate functions;
- complaints relating to the products and services of NUOVA SITT such reports shall continue to be sent to the relevant corporate functions;
- reports of violations already mandatorily regulated by European Union or national acts or by national acts implementing European Union acts in the following areas: financial services, prevention of money laundering or terrorist financing, transport safety, environmental protection
- reports of breaches of national security and procurement relating to defence or national security aspects, unless these aspects are covered by relevant secondary European Union law.

For all ordinary reports, you can use the special form M17.00_P17.04 'Ordinary Reports Form', available on all company notice boards, which can be sent by email, regular mail and/or be placed in the company's reporting box.