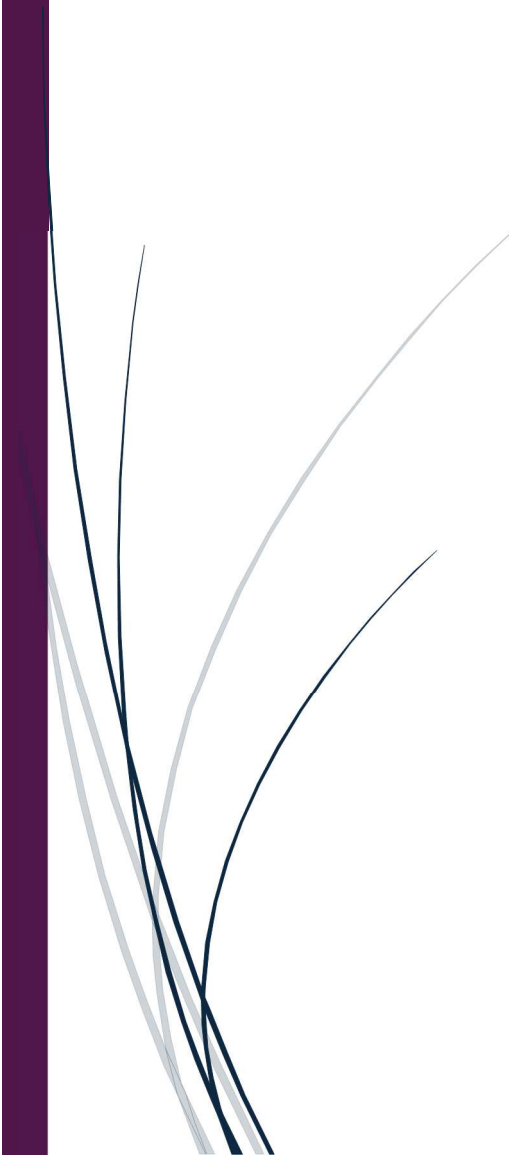




FASAC1955

CODE OF ETHICS

Legislative Decree 231/01 and
subsequent amendments



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CODE OF ETHICS

ORGANIZATION

FASAC S.P.A.

Registered Office:

Via Manzoni, 222
22070 – Cassina Rizzardi (CO)

Local Unit no. cn/1 – Office

Via Santa Barbara, 11
12051 – Alba (CN)

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Via Tommaso da Cazzaniga, 9/6
20121 – Milan (MI)

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1. GENERAL INTRODUCTION

1.1. PREAMBLE

Fabbriche Associate Studio Applicazioni Cotone Società per Azioni (hereinafter "Fasac" or the "Company") is a benchmark for the textile sector, operating in the trading, processing and sale of textile products, including cotton, wool, silk, synthetic fibres and their derivatives.

Fasac is currently wholly-owned by STAMPERIA DI CASSINA RIZZARDI S.p.A., which holds the 300,000 Company shares.

With a staff of around 160, Fasac is governed by a Board of Directors and a Board of Statutory Auditors that guarantees legal compliance and proper administrative management.

The organizational structure of Fasac comprises three main areas:

- Commercial Area:

under the Managing Directors and the Sales Director, is responsible for the development of samples and offers for customers.

- Technical/Design Area:

works with the commercial area and the supply chain to create new designs and follow-up the production of items at subcontractors.

- Administrative Area:

supports the Company through departments specialising in HR, accounting, legal, security, management control and financial administration.

- IT Area

supports the Company through the implementation, management and monitoring of corporate IT systems.

Fasac also uses outsourced services under specific contracts in order to optimise its operations.

With this document the Company seeks to set out for those with whom it interacts in the conduct of its business and in full cognizance of the challenges of sustainable development as well as the expectations of all legitimate Stakeholders, a clear definition of the values and responsibilities that it recognizes, accepts, shares and undertakes to fulfil.

1.1. RECIPIENTS OF THE FASAC CODE OF ETHICS

Fasac is committed to promoting legality, fairness, transparency and respect for human rights, as an integral part of its business activity. The Company considers full adherence to the principles of social responsibility and sustainability, as well as the creation of a safe, fair and inclusive working environment, as fundamental to long-term success and the maintenance of its reputation.

This Code of Ethics is the document that collects and formalises these principles, intended to regulate every aspect of work activity and relations with all stakeholders. It applies to all persons operating in any capacity within Fasac, which is committed to ensuring compliance with these principles and their consistent application.

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The recipients of this Code are:

- The Company's shareholders, who must commit to operating in a way that promotes respect for the rights and dignity of workers, as well as ensuring sustainability and transparency in Company operations.
- The members of the Board of Directors (BoD), of the Board of Statutory Auditors (CS), and of the Supervisory Body (SB), who are responsible for supervising compliance with the regulations on workers' rights, safety, and prevention of crimes pursuant to Legislative Decree 231/01, with particular attention to protection combating forced or child labour and promoting equal treatment for all.
- Employees, interns and contractors, who are required to comply with the provisions set forth in the Code and to promote a work environment free of discrimination and harassment, ensuring the mental and physical well-being and health of colleagues.
- Business partners (customers, suppliers, etc.), with whom Fasac establishes transparent and correct relations, which guarantee respect for human rights and regulations relating to safe and dignified working conditions.
- External stakeholders, such as the public administration, supervisory authorities and trade unions, with whom the Company is committed to maintaining relations based on respect for the law, probity and the promotion of social justice.

Fasac believes that compliance with the principles set forth in the Code of Ethics, including those related to gender equality, non-discrimination, protection of the health and safety of workers, environmental sustainability and the protection of human rights, is essential to maintain a leading position in the textile sector and to ensure the trust of stakeholders.

Within the Company's internal control system, the Code:

- constitutes a key management tool for ethical conduct in the conduct of Company business, together with the rules and agreements in force;
- is an integral part of the Organization, Management and Control Model pursuant to Legislative Decree 231/01 (hereinafter also "Model"), to which it forms an Annex.

All activities managed by Fasac or on its behalf must, therefore, comply with the principles and precepts expressed in this document.

In this context, Fasac intends to:

- promote recipients' knowledge of the Code;
- take into account the suggestions and observations that may be made by Recipients, with the aim of confirming, amending or supplementing the Code;
- carefully monitor compliance with the Code, preparing adequate information, prevention and control tools and procedures, intervening, where appropriate, with corrective actions.

This verification, as described in more detail below, is carried out by the Company's SB.

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It is the responsibility of the recipients to:

- apply the Code of Ethics and propose updates according to their different responsibilities;
- report any violations of the Code in the manner indicated in point 6.3.2.

Through the adoption of this Code of Ethics, Fasac intends to define the moral values, rules and procedures that must be followed.

The recipients of this Code of Ethics are required to familiarize themselves with its contents and respect its precepts.

The Code of Ethics will be made available by the Company, which is responsible for its effective implementation and dissemination within and outside the organization.

Company employees, in addition to respecting the regulations in force and the provisions of collective bargaining – where applicable -, undertake to adapt the methods of performance of work to the purposes and provisions of this Code.

With this document, Fasac stresses the importance of respecting the principles set out herein with reference to both internal relations within the Company and with external parties, in particular with Public Administrations and other authorities. To ensure mutually advantageous cooperation, the Company makes the Code of Ethics available to external partners on its website.

The Code of Ethics also aims to introduce and bind the Company to the principles and rules of conduct relevant to the reasonable prevention of the offences indicated in Legislative Decree 231/2001.

The Code, considered as a whole and together with all the specific implementation procedures approved by the Company, is considered an integral part of existing and future employment contracts pursuant to Article 2104 of the Italian Civil Code (*Employee diligence*).

The violation of its provisions will, therefore, constitute an offence of a disciplinary nature and, as such, will be prosecuted and penalized by the Company pursuant to and for the purposes of Article 7 (*Disciplinary penalties*) of Law no. 300/1970 (*Workers' Statute* - Rules on the protection of workers' freedom and dignity, trade union freedom and trade union activity in the workplace and rules on job placement) and may entail compensation for damages caused to the organization.

As for contractors, consultants and self-employed persons who perform activities on behalf of the Company and other third parties, adherence to this Code or an excerpt thereof or, in any case, to the provisions and principles provided for herein represents a *conditio sine qua non* for the stipulation of agreements of any kind between the Company and said persons. The provisions thus signed or, in any case, approved, even by mere conduct, constitute an integral part of said agreements.

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Given what has been described so far, the Code of Ethics must be applied by all recipients and carefully monitored to ensure that business practices always comply with the ethical standards imposed. Violation of the Code of Ethics is considered a disciplinary offence and may result in penalties, including termination of the agreement for external contractors and termination of employment contracts for employees; any violation may also be identified *ex ante* as a cause for automatic termination of the agreement pursuant to Article 1456 of the Italian Civil Code (*express termination clause*).

The responsibility for enforcing compliance with the Code of Ethics is devolved to the Supervisory Body (SB), which is responsible for overseeing compliance with regulations and taking action in the event of violations.

2. PRINCIPLES OF CONDUCT FOR THE ORGANIZATION

2.0 PREAMBLE

The principles listed below are considered fundamental for the Company which undertakes to respect them with regard to all whatsoever parties.

It is essential that these values do not remain mere statements but are manifested as conduct and behaviour inherent to the Company.

As an organization and as individuals, all recipients, in the work environment, are required to apply them correctly in both internal and external operations and relations.

Fasac's Ethical and Responsibility Principles

1. Integrity of conduct and respect for the law

Fasac is committed to fully respecting applicable local, national and international laws, always acting with transparency, honesty and responsibility in every aspect of its business activity.

2. Rejection of all forms of discrimination

Fasac promotes an inclusive work environment free of any discrimination based on sex, race, religion, age, disability, sexual orientation or other personal characteristics. Each individual must be treated with respect and dignity.

3. Central role of human resources and optimizing their potential

Fasac seeks to optimize talent and guarantees equal opportunities for professional development, promoting gender equality and welfare policies for the well-being of employees. The Company protects the rights of workers, combating discrimination, forced and child labour, and ensuring safe and dignified working conditions. It supports freedom of association and collective bargaining and is committed to offering a fair, healthy and responsible working environment in full compliance with all labour and environmental regulations.

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4. Deep roots in the local area

Fasac is committed to being a business firmly rooted in the surrounding neighbourhood, supporting the local community and contributing to the social and economic well-being of the people who live in it.

5. Transparency and business ethics

Fasac operates with the utmost transparency and integrity in all its operations and is committed to doing business ethically, avoiding conflicts of interest and ensuring fair treatment of all parties involved.

6. Quality

Fasac is committed to guaranteeing the highest quality at every stage of production, from the materials used to the attention to detail in the production process, up to the final result.

7. Diversity and inclusion

Fasac promotes and celebrates diversity by welcoming people from different backgrounds and experiences, who enrich the Company culture and contribute to creative and innovative solutions.

8. Legality and combating crime and terrorism

Fasac firmly adheres to the principles of legality and is committed to combating all forms of crime, including terrorism and other illegal activities, operating in a responsible and safe manner.

9. Protection of human rights and equal treatment

Fasac respects human rights in all its activities and guarantees safe, healthy and respectful working conditions for the dignity of each individual, promoting equal treatment among employees.

10. Respect for the environment

Fasac is committed to protecting the environment through sustainable practices, reducing the environmental impact of its production activities, promoting energy efficiency and the use of renewable resources.

11. Staff health and safety

Fasac adopts strict measures to protect the health and safety of its employees and contractors, ensuring a risk-free working environment in line with current regulations.

12. Employee wellbeing

Fasac fosters the physical, mental and social well-being of employees, ensuring policies that support a balance between work and personal life, and seeks to create a positive and stimulating environment.

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13. Freedom of expression

Fasac protects the right of its employees to freely express their opinions, ensuring an environment where dialogue, open communication and mutual respect are always encouraged.

The Company expects these values to define its identity, uniting employees and contractors within its overall organizational structure.

2.1 INTEGRITY OF CONDUCT AND RESPECT FOR THE LAW

Fasac is committed to creating and providing quality products and services and to competing in the textile sector according to principles of free and fair competition and transparency, maintaining correct relations with all public, governmental and administrative institutions, with citizens and with third-party companies. Each member of the Company is required to operate, in any situation, with integrity, transparency, consistency and fairness, conducting each business relation honestly.

Fasac operates in strict compliance with the Law and ensures that all staff do likewise: all employees must conduct themselves in accordance with the Law, regardless of the context, role and activities carried out and the places in which they operate.

This commitment must also apply to consultants, suppliers, customers and anyone who has relations with Fasac.

The Company, therefore, will not initiate or continue any relation with those who do not seek to align themselves with this principle.

2.2 REJECTION OF ALL FORMS OF DISCRIMINATION

In decisions concerning relations with stakeholders, such as staff management, work organization, selection and management of suppliers, and relations with the community and institutions, the Company undertakes to avoid any form of discrimination based on age, gender, sexual orientation, health status, ethnicity, nationality, political opinions and religious beliefs.

2.3 CENTRAL ROLE OF HUMAN RESOURCES AND OPTIMIZING THEIR POTENTIAL

Fasac recognizes the central role played by human resources and believes that the professional contribution of its people is a prerequisite for the success and growth of its business. The Company has always placed the professionalism and individual contribution of people at the centre of its business, ensuring an ongoing approach to relations that aims to recognise the work of each person as a fundamental aspect for both corporate and personal development. In this context, the Company promotes a culture of open dialogue, information sharing and constant professional updating, while reinforcing the sense of belonging and the creation of a strong corporate identity.

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Fasac pays particular attention to the optimizing the potential of each individual, creating a work environment that supports professional growth through a gradual increase in responsibilities and the ability to best deploy their talent. The Company is committed to fostering teamwork, preferring a horizontal relational structure over traditional hierarchical relations, and encourages the sharing of knowledge, including through the use of innovative systems, to improve efficiency and cooperation at all levels.

This value is manifested by:

- The creation of a work environment that optimizes the potential of individual contributions, through the assignment of increasing responsibilities and an opportunity for continuous development;
- The promotion of a culture that fosters cooperation and sharing, supported by a constant flow of information, feedback and professional training;
- Supporting individual and collective growth through policies of constant updating and the use of advanced technologies that facilitate learning and performance enhancement.

Fasac continues to foster a dynamic, inclusive and meritocratic work environment, where every employee is encouraged to give their best, thus contributing to the success and growth of the entire Company.

2.4 DEEP ROOTS IN THE LOCAL AREA

In the conduct of its business, Fasac seeks to deploy projects encouraging the direct involvement of citizens, public and private institutions, entrepreneur and trade associations. The Company does and will continue to actively ensure that the businesses with which it works comply with the same rules of conduct according to the same principles and values.

Fasac also promotes local development through a strong connection with the various players in the local community concerned. Within the local community it strives to develop a wealth-generating Company, capable of recognizing and optimizing the potential of human resources that compose it, the skills and potential available, the gender, cultural and ethnic differences, promoting well-being, integration and social development and enhancing recognition of same by users and those who actually offer the service.

2.5 TRANSPARENCY AND BUSINESS ETHICS

The history, identity and values of the organization are founded on a business ethic based on:

- Reliability

Understood as a guarantee of the serious approach to the projects launched, in transactions and in the commitments made.

- Robustness

Since 1955, Fasac has built up its capital assets on the firm foundation of its long-term business. The Company is distinguished in the market by its vertically-integrated and efficient production process.

- Transparency

Transparency implies a concept of the corporate role that is not limited to respecting ethical principles and practices, but extends to the promotion and adoption of methods that allow communities and social players to access the information necessary to evaluate the work of the Company.

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- Contractual fairness

This parameter is essential to ensure fairness in contractual relations, preventing third parties with whom the Company has relations from exploiting contractual loopholes or unforeseen events to renegotiate a contract, by exploiting the vulnerable position of the Company or other parties involved.

- Protection of competition

This protection is expressed in the avoidance of collusive, predatory behaviour and abuse of power.

- Good faith

It is essential that, in both internal and external Company relations, respect for the principles of good faith is always guaranteed, ensuring transparency, fairness and loyalty in all negotiations and interactions, in order to protect the interests of all parties involved.

2.6 QUALITY

The quality of the textile products offered by Fasac is a distinctive feature of our Company. We are actively committed to ensuring high standards at every stage of our production, in line with our long-term strategy. Our activities are managed through a quality management system which ensures uniformity, transparency and continuous service improvement, so that our customers can always rely on the excellence of our products.

2.7 DIVERSITY AND INCLUSION

The Company requires its directors, employees and contractors to behave in a way that guarantees the utmost respect for the dignity of people.

Therefore, the organization must:

- guarantee the most scrupulous observance of the rules for protection from child and juvenile labour, as well as the freedoms and rights of workers.
- ensure conditions of free membership of trade unions.
- condemn human rights violations.
- promote integration into the social fabric as a form of collective enrichment. In particular, the Company condemns all forms of discrimination based on gender, ethnic, political and religious affiliation.

2.8 LEGALITY AND COMBATING CRIME AND TERRORISM

Fasac believes implicitly in democratic values and firmly condemns any activity that may have the purpose of terrorism or subversion of the democratic order.

In addition, the organization condemns any activity that involves:

- forgery, counterfeiting, alteration and/or improper use of coins, public credit cards and stamp duty marks.
- The management of proceeds from criminal activities, such as money laundering.
- Unauthorized access to external computer systems.
- Illegal possession of access codes.

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- Damage to equipment and data.
- Fraud in the management of electronic signature certification.
- Interception, impediments and interruptions of computer communications.
- Dissemination of ideas of tolerance and silence regarding the use of drugs or other forms of addiction.
- Incitement to carry out illegal acts or acts contrary to good morals.
- Negligence in combating violence, damage to public property and in ensuring compliance with internal regulations.

2.9 HUMAN RIGHTS, WORKING CONDITIONS AND EQUAL TREATMENT

Fasac is committed to ensuring that all its employees and contractors are treated with dignity and respect, in accordance with fundamental human rights. The Company is committed to preventing and combating all forms of forced labour, child labour and discrimination. Promotes gender equality and supports inclusive policies that guarantee equal opportunities for all, regardless of sex, ethnicity, religion, sexual orientation, disability or other personal characteristics. The Company promotes a safe, fair and inclusive working environment, compliant with international standards and national laws.

2.9.1. NO RESORTING TO USE OF FORCED OR COMPULSORY LABOUR

Fasac strongly condemns any form of forced or compulsory labour. Employment contracts that bind employees through coercion, threats or other practices detrimental to individual freedom are not tolerated. Each employee must be free to withdraw from their employment relation, in compliance with current regulations. Fasac guarantees that employees are not obliged to deposit identity documents or other forms of bail with the employer, nor are they obliged to pay for hiring or for maintaining the job. In addition, workers are free to leave the workplace at the end of the shift and are not obliged to use the accommodation or transport provided by the Company.

2.9.2. NO RESORTING TO CHILD LABOUR AND PROTECTION OF YOUNG WORKERS

Fasac is committed to strict compliance with local and international child labour laws. Recourse to child labour in any form is prohibited and special protections are provided for workers under the age of 18. Minors must not be employed in work that may compromise their safety, health or mental/physical development. In particular, the minimum age for employment may not be less than 15 years (or 14 years in developing countries, according to Convention no. 138 of the International Labour Organization). If a child is identified as performing work, appropriate measures will be taken to remove them and ensure their access to education.

2.9.3. PROTECTION OF VULNERABLE CATEGORIES

Fasac adopts specific measures to protect vulnerable groups, including but not limited to the protection of pregnant women, young workers and people with disabilities.

All employees must be protected from hazardous or harmful working conditions.

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Fasac guarantees professional advancement opportunities in an inclusive and non-discriminatory work environment.

2.9.4. GENDER EQUALITY AND NON-DISCRIMINATION IN THE WORKPLACE

Fasac guarantees equal opportunities to all its employees, regardless of gender, ethnicity, sexual orientation, religion or any other personal characteristic. The Company promotes an inclusive, non-discriminatory work environment and supports equal treatment for all. Company policies facilitate gender equality, in particular through the protection of workers during maternity, and condemn any form of discrimination, harassment or violence, both during the selection process and in daily activities. Fasac ensures that any report of discrimination is treated seriously, confidentially and promptly.

2.10. RESPECT FOR THE ENVIRONMENT

The Company recognizes the importance of protecting the environment and is committed to reducing its ecological impact by implementing sustainable practices in all business operations. Fasac adapts to environmental regulations and promotes the responsible management of natural resources, the adoption of environmentally friendly technologies and the reduction of polluting emissions.

2.10.1. MONITORING AND REDUCTION OF ENERGY AND WATER CONSUMPTION

Fasac constantly monitors energy and water consumption, striving to reduce them through energy efficiency practices, the use of renewable sources and the reduction of waste. Every employee is encouraged to actively contribute to the reduction of consumption, through responsible and aware conduct.

2.10.2. CORRECT MONITORING AND DISPOSAL OF WASTEWATER

Fasac ensures that all waste produced by its activities is treated and disposed of in accordance with current environmental laws. Waste is disposed of safely and responsibly, avoiding damage to the environment and human health.

2.10.3. MONITORING OF GAS EMISSIONS INTO THE ATMOSPHERE

Fasac regularly monitors its emissions of greenhouse gases and other pollutants into the atmosphere. The goal is to minimize the environmental impact through the adoption of clean technologies and low-emission production processes.

2.10.4. CORRECT DISPOSAL OF SOLID WASTE AND RECYCLING

Fasac promotes responsible solid waste management, with policies for reduction, reuse and recycling. Employees are trained in proper waste disposal and recycling practices, to ensure that each step of the process complies with environmental standards.

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2.11. STAFF HEALTH AND SAFETY

The Company recognizes that occupational health and safety is critical to employee well-being and the long-term success of the organization. Fasac is committed to creating a safe and healthy working environment, which complies with current regulations on health and safety.

2.12. STAFF WELL-BEING

Fasac recognizes the importance of promoting the mental and physical well-being of its employees. The Company is sensitive to work-life balance issues and welfare policies.

2.13. FREEDOM OF EXPRESSION AND RESPECT FOR INDIVIDUAL RIGHTS

Fasac protects the freedom of expression of its employees, respecting the right of each individual to express their opinions, it being understood that such opinions must never compromise the working environment or harm the dignity of others. The Company promotes a culture of respect, where individual rights are safeguarded and where every employee is encouraged to freely express their ideas, respecting Company values and collective cooperation.

3 STAKEHOLDERS

3.1 CUSTOMERS

Fasac's primary objective is the full satisfaction of its customers' needs.

Within this framework, the organization strives for optimum performance of the tasks entrusted to it and is constantly oriented to propose increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency and cost-effectiveness.

The Company provides accurate, complete and truthful information so customers can take rational and informed decisions. It protects the privacy of its customers in accordance with current regulations on the subject, undertaking not to communicate or disseminate the related personal data without prejudice to legal obligations.

The Company also adopts a communication style based on efficiency, cooperation and courtesy.

3.2 FINANCIAL INSTITUTIONS

The organization maintains relations with financial institutions based on fairness and transparency, with the aim of creating value for the Company.

To this end, financial institutions are selected on the basis of their reputation, also taking into account their adherence to values that are in line with those expressed in this Code of Ethics.

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3.3 SUPPLIERS

Suppliers of goods and services

Fasac establishes cooperative relations with its suppliers that comply with current regulations, the principles of social responsibility and sustainability, as well as the values expressed in this Code of Ethics. It is essential that all suppliers adopt ethical practices in line with the principles of legality, respect for human rights, equal treatment, protection of health and safety at work, as well as respect for the environment.

Fasac works exclusively with suppliers who ensure:

- respect for human rights and labour regulations: suppliers must ascertain that no forced or compulsory labour or child labour is used and be committed to ensuring that workers can terminate their employment freely, without threats or coercion, and without having to deposit identity documents or pay for recruitment or retention. Workers must be free to leave the workplace at the end of their shift without restriction.
- Safe and healthy working environment: suppliers must take appropriate measures to ensure the health and safety of workers, including the protection of vulnerable categories, such as young workers, pregnant women and people with disabilities. They must prevent occupational accidents and diseases, ensure compliance with occupational safety regulations and provide a work environment free of discrimination and harassment.
- Non-discrimination: Suppliers must respect the principle of equal treatment, refraining from any form of discrimination against workers, whether based on sex, race, ethnicity, religion, sexual orientation, disability or any other personal characteristic. In addition, they must promote an inclusive work environment, which fosters gender equality and refrain from practising or tolerating harassment or violence.
- Environmental sustainability: Suppliers must commit to monitoring and reducing the consumption of natural resources (such as energy and water), the reduction of greenhouse gas emissions and proper management of solid and liquid waste and promote recycling. They must also comply with local and international environmental regulations and commit to using technologies and practices that minimize the environmental impact of their activities.

Fasac undertakes to periodically verify that suppliers comply with the principles of this Code and to take appropriate action in the event of violations, which may include suspension or termination of the business relation.

3.3.1. SELECTION OF SUPPLIERS AND COMPLIANCE WITH ETHICAL STANDARDS

Suppliers are selected with the aim of ensuring that they comply with the ethical standards established in the Code of Ethics. The selection process is transparent, fair and aimed at ensuring that suppliers respect workers' rights, adopt safe working practices, and protect the environment.

Fasac evaluates suppliers on the basis of their adherence to the principles of legality, integrity and social responsibility, before entering into any business relation.

3.3.2. HUMAN RIGHTS AND WORKING CONDITIONS AT SUPPLIERS

Fasac verifies that its suppliers operate in accordance with the principles of respect for human rights and working conditions established by the Code of Ethics. This includes the prevention of forms of forced labour, compliance with child labour laws, and the promotion of safe and healthy working conditions. The Company periodically carries out audits and checks to ensure that suppliers take appropriate measures to ensure a working environment that respects workers' rights, including the principles of non-discrimination, equal treatment and the protection of vulnerable categories.

Internal and external consultants

Fasac selects its consultants, both internal and external, on the basis of their professionalism, reputation, reliability and adherence to values aligned with those expressed in this Code of Ethics. Consultants are chosen from among those who share Fasac's commitment to ensuring respect for human rights, safety at work, equal treatment and environmental protection.

Relations with consultants are based on clear and transparent agreements and are aimed at achieving common objectives in accordance with legal regulations and the principles of the Code of Ethics.

Fasac is committed to ensuring that consultants do not engage in forced labour, child labour, discrimination or harassment.

In particular, consultants must:

- Avoid forced or compulsory labour policies: they must not impose working conditions that force workers to remain in their employment against their will, nor must they demand payments for hiring or for remaining in employment. Ensure that workers are free to leave the workplace at the end of their shift without restriction.
- Adopt non-discrimination and gender equality policies: they must commit to ensuring equal treatment and opportunities for all employees, without discrimination based on sex, ethnicity, religion, sexual orientation, disability, age or any other personal characteristic. Promote an inclusive working environment, with particular attention to gender equality, the well-being of workers and the protection of those belonging to vulnerable groups.
- Respect health and safety standards: they must take appropriate measures to ensure the safety and health of workers, preventing accidents and illnesses. Comply with all occupational safety regulations and protect vulnerable workers from special hazards.
- Promote environmental sustainability: they must be committed to protecting the environment, reducing the environmental impact of their activities and adopting ecological practices, such as energy saving, waste management and recycling, and reducing polluting emissions.

Fasac is committed to constantly monitoring the work of consultants, to ensure that their activities are aligned with the principles of this Code of Ethics. If non-compliant behaviour is detected, Fasac will take corrective action, which may include early termination of consultancy agreements.

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3.4 PUBLIC ADMINISTRATION

Public Administration means any person, entity or interlocutor classified as a Public Official or Public Service Officer who operates on behalf of the central or peripheral Public Administration, or Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private partners who hold concessions to perform a Public Service.

The Company bases and adapts its conduct, in relations with the Public Administration, according to the principles of fairness and honesty. On this basis, the persons appointed by Fasac, to follow-up any negotiation, request or institutional relation with the Public Administration, Italian or foreign, must not for any reason try to improperly influence its decisions or engage in unlawful conduct such as the offer of money or other benefits, which may unduly influence the impartiality of judgment of the representative of the Public Administration.

The persons appointed by the Company organization to manage relations with any Public Administration authority must verify that the information provided in any way and for any reason is true, accurate and correct. The persons permitted to enter into direct contact with the Public Administration on behalf of the Company are the only ones expressly appointed by the Company for this purpose, no other employee may have any kind of relation with the Public Administration for activities related to the Company's corporate purpose.

When submitting tenders, the persons appointed by the Company must comply with the law and the relevant regulations.

Grants and funding

Contributions, grants or funding obtained from the European Union, the State or other Public Entity, even if of modest value and/or amount, are used for the purposes for which they were requested and granted.

The Company prohibits the recipients of this Code of Ethics from using the funds received from Public Administrations and/or inter-professional funds for purposes other than those for which they were disbursed.

Similarly, in the event of participation in procedures open to public scrutiny, the recipients of this Code of Ethics are required to operate in compliance with the law and correct commercial practices, avoiding in particular any inducement for Public Administrations to unduly favour the Company.

The Company undertakes to prevent acts that incite the recipients of this Code of Ethics to carry out actions aimed at obtaining unlawful advantages. The use of altered or falsified declarations or documents or the omission of information or, in general, the use of subterfuge or expedients, aimed at obtaining concessions, authorizations, funding or contributions from the European Union, the State or other Public Entity, also constitutes unlawful conduct.

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3.5 PUBLIC SUPERVISORY AUTHORITIES

The Company conducts transparent dialogue with all political movements, local associations and public institutions, both territorial and national, to ensure an adequate representation of its positions on issues and questions of significant interest.

3.6 STAKEHOLDER POLITICAL MOVEMENTS, ASSOCIATIONS AND INSTITUTIONS

The recipients of this Code of Ethics undertake:

- to scrupulously observe the provisions issued by the competent institutions or Public Supervisory Authorities for compliance with current legislation in the sectors related to their respective areas of activity.
- No applications or requests containing untrue declarations are submitted in the context of investigations with Public Supervisory Institutions and/or Authorities in order to obtain public grants, contributions or subsidised loans or to unduly obtain concessions, authorizations, licences or other administrative acts.
- To comply with any request from the aforementioned institutions or Authorities within the scope of their respective supervisory functions, providing – where required – full cooperation and avoiding obstructionist behaviour.

4 PRINCIPLES OF CONDUCT TO BE FOLLOWED BY THE COMPANY 'S EMPLOYEES AND CONTRACTORS

4.1 PROFESSIONALISM AND LOYALTY

Each person will perform their work and provide services with diligence, efficiency and fairness, making the optimum use of the resources and time at their disposal, in full acceptance of all responsibilities related to compliance.

Another important aspect for the Company is that people are required to be loyal both in internal Company relations and with regard to persons outside the Company.

4.2 HONESTY

As part of their work activities, the Company's employees and contractors are required to familiarize themselves with and conscientiously comply with the Model 231 and current regulations. Honesty is the fundamental principle that guides all corporate activities and represents a crucial value for organizational management. Interactions with all stakeholders must be characterized by fairness, cooperation, loyalty and mutual respect. Dishonest behaviour in the pursuit of business interests cannot be justified under any circumstances.

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4.3 LEGALITY

The organization undertakes to comply with all national and international rules, laws, directives and regulations and all generally recognized practices. In addition, it founds its decisions and conduct on concern for the public interest and trust.

4.4 FAIRNESS AND TRANSPARENCY

The Company's staff must not use for personal ends, any information, goods and equipment available to them in the performance of the duties or tasks assigned to them. Individual employees may not accept or make on their own account or if incited by others, recommendations or reports that may harm the Company or procure undue advantages for themselves, the Company or third parties. Individual employees must reject and refrain from making any promises of improper offers of money or other benefits. Fasac, therefore, undertakes to operate in a clear and transparent manner, without favouring any interest group or individual.

4.5 CONFIDENTIALITY, ETHICS AND RESPECT FOR RIGHTS IN THE PROCESSING OF COMPANY INFORMATION

All members of Fasac are required to guarantee the utmost confidentiality regarding all information and news that constitute the Company's assets or that are related to the Company's activities. This obligation of confidentiality must be respected in accordance with applicable laws, regulations and rules, as well as the internal policies of the Company. It is forbidden to use confidential information for purposes not strictly related to the exercise of staff's professional duties.

The Company undertakes to ensure that no worker is forced to work under conditions of coercion, threat or intimidation. Each employee shall be free to terminate their employment on a voluntary basis, upon reasonable notice, without obligation to deposit identity documents or sureties with the employer or third parties, and without additional costs for their hiring or retention in employment. In addition, the Company ensures that workers are not obliged to use Company-provided accommodation or transportation.

The Company respects and protects the fundamental rights of all workers, undertaking not to resort to forced or child labour, and to protect in particular young workers, pregnant women, mothers and people with disabilities, offering them safe, dignified and respectful working conditions ensuring their health and safety. Any practice of discrimination, harassment or violence in the workplace is strictly prohibited, and the Company actively promotes an inclusive and respectful environment, where every individual, regardless of gender, ethnicity, sexual orientation, religion or other personal characteristic, is treated with respect and dignity.

In addition, Fasac adopts gender equality and non-discrimination policies, and is committed to guaranteeing equal opportunities to all employees, also supporting the right to freedom of association and collective bargaining.

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Finally, Fasac is committed to monitoring and reducing the environmental impact of its activities, responsibly managing natural resource consumption, greenhouse gas emissions, liquid and solid waste, and ensuring that all practices comply with local and international environmental regulations.

4.6 RESPONSIBILITY TOWARDS THE COMMUNITY

Fasac recognizes its fundamental role in the social and economic context and is committed to operating ethically and responsibly, respecting the rights of people and the surrounding environment. The Company adapts to local and national needs, seeking to exert a positive impact through cultural, educational and social initiatives that contribute to the sustainable development of the community.

Fasac refrains from practices that may compromise the well-being of workers or people involved in its activities, such as forced or child labour or discrimination of any kind. The Company promotes a safe and inclusive work environment, in which every individual, regardless of gender, age, origin, or orientation, is treated with dignity and respect.

Fasac is also committed to complying with environmental laws and regulations, contributing to reducing the consumption of natural resources, managing waste and emissions responsibly, and adopting sustainable practices in its production processes. Through these actions, the Company not only enhances its reputation and consolidates the legitimacy of its business, but also positions itself as a positive and responsible actor in the community, promoting social cohesion and collective well-being.

4.7 RESOLUTION OF CONFLICTS OF INTEREST

In the course of their work activities, employees and contractors must be dedicated to achieving the objectives and general interests of the Company. They are required to promptly inform their line managers or contact persons of any situations in which conflicts of interest may arise, whether they concern themselves or their family members, in addition to in any other appropriate circumstances. In addition, employees and contractors undertake to respect the decisions that the Company may make regarding such matters.

4.8 SENSE OF BELONGING

In carrying out work activities, Fasac employees and contractors undertake not to hinder or in any way prejudice the creation of a sense of belonging to their organization, work group or vis-a-vis third parties.

4.9 MUTUAL RESPECT AND INCLUSIVE WORK ENVIRONMENT

People who cooperate with Fasac in any role and in any capacity are required to actively demonstrate respect for the tasks and skills of others, creating a work environment of professionalism and integrity. It is essential that each team member avoids expressing personal opinions to third parties on how the activities are carried out, thus helping to maintain a cooperative and respectful environment. In addition, the Company is committed to ensuring a work environment that is free of harassment, discrimination or abuse of any kind.

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Every employee has the right to work in a context where the mutual respect, dignity and well-being of each individual are at the centre of daily interactions, fostering the creation of a climate of trust and cooperation.

4.10 SPECIFIC OBLIGATIONS

Staff who cooperate with Fasac in various roles and capacities are required to follow the instructions given in this document, in particular they must comply with the values of:

- **TRANSPARENCY**

It is good practice to ensure that all information relating to business activities is accessible to all employees and contractors. Each employee and contractor in any capacity is responsible for maintaining a constructive dialogue with their manager and colleagues, respecting each other's commitments to facilitate cooperation throughout the tasks assigned.

In the event of misunderstandings or difficulties, it is essential that everyone first contacts their own line manager or contact person. It is essential to act with loyalty and independence, avoiding any imposition of conditions that may influence the work, both towards the customer and with regard to external organizations with which staff may be required to interact.

It is forbidden to establish inappropriate economic relations or accept valuable gifts or favours from the customer's organizations and suppliers. In addition, it is mandatory to report, both at the time of acceptance of the professional assignment and during its performance, any relation or interest shared with external organizations that may generate conflicts of interests.

- **CONSISTENCY**

It is essential to honour the commitments made, making sure to complete each task assigned. It is important to avoid accepting responsibilities that staff are aware they cannot fulfil.

- **COURTESY AND KINDNESS**

The basis of every daily activity for Fasac is the importance of the values of courtesy and kindness which must form the cornerstones of interpersonal relations within the Company and with third parties.

- **PUNCTUALITY**

It is good practice, if you are late for an appointment, to inform the person concerned before the scheduled appointment. To notify the delay only afterwards constitutes rude behaviour. Being on time shows respect for those who are waiting.

- **CONFIDENTIALITY AND PROFESSIONALISM**

All information and data managed in the workplace are the property of the Company and must be considered confidential. It is essential to be professional which implies understanding and adopting appropriate behaviour - essential for achieving the best possible outcome, taking into account the needs of both customers and the Company. Regardless of the activity in progress, professionalism must always be at the centre of the activities to be performed.

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- **CORPORATE RESPECT**

It is the responsibility of each employee and contractor to share and ensure compliance with Company policies. In carrying out daily activities, it is essential to protect the interests and image of the Company, showing the utmost respect for its propriety. It is important to consider the economic implications of your decisions, avoiding waste and inefficient conduct.

- **WORKSTATIONS**

Each employee and contractor is responsible for their own workstation. Everyone is responsible for the care and cleaning of the resources at their disposal.

- **PERSONAL COMPUTERS AND MOBILE PHONES**

The personal computers supplied must be kept in the best possible condition and no other programs may be installed except those configured for corporate purposes.

The hardware equipment made available by the Company are resources exclusively for professional use and must not be used for personal purposes.

In particular, the files contained therein constitute Company assets and may not be arbitrarily damaged and/or destroyed.

It is absolutely forbidden to use hardware devices for copying and/or storing files and data, such as USB large data memories, laptops, optical discs, disc burners and any other electronic storage medium/ method (including the cloud), unless expressly authorised by the Company.

Finally, with reference to the use of mobile phones, improper use is not recommended in order to avoid abuse. In fact, it should be recalled that when using a mobile phone, the rules of good conduct should be followed as part of good working practices.

- **INTERNET**

The Internet connection is a working resource and must be used only in this capacity.

The use of the Internet for private purposes is allowed only outside working hours.

Internet browsing:

- is not allowed for websites that do not directly relate to the performance of the assigned tasks, especially those that maybe used to identify the political, religious or trade union opinions of the employee;
- must not be used carry out any kind of financial transaction, including remote banking operations, online purchases and the like, except in cases directly authorised by the Company and in compliance with normal purchasing procedures;
- the download and installation of free software (freeware), shareware, P2P and/or FTP, taken from websites, is not allowed, unless expressly authorised by the Company or for purposes strictly related to the work activity;
- any form of registration on websites whose content is not related to work is prohibited;
- The participation, for non-professional reasons, in forums, or the use of chat lines is not allowed, the storage of computer documents of an outrageous and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation, etc., is not allowed.

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- EMAIL

Email is a corporate tool and is not to be considered as a means for private correspondence and therefore:

- any e-mail message (as it relates to the work activity) may be copied and/or made public at any time;
- use of e-mail (internal and external) for reasons not related to the performance of the assigned tasks is prohibited;
- sending or storing messages (internal or external) of an outrageous nature, discriminatory by sex, language, religion, race, ethnic origin, opinion or trade union and/or political affiliation etc. is prohibited.
- The set up and use of email accounts external to the Company is prohibited.

- COMPANY CAR

The Company car is under the total responsibility of the person to whom it has been assigned, and in the same way as all other Company assets, should be used and maintained with the utmost care and attention.

In the event of use of a personal car for work purposes or when using a Company car, the driver is expected at all times to comply fully with the requirements of the highway code.

Any fines resulting from violations of the highway code remain the responsibility of the driver of the Company car.

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5 CONDUCT CRITERIA

5.0 INTRODUCTION

The rules contained in this section are intended to indicate to the recipients of this Code of Ethics the attitudes and conduct to be observed during the performance of the various Company activities in accordance with the values on which this document is based.

All recipients of this Code of Ethics (identified in paragraph 1.1. of this document) must observe correct and transparent conduct in the performance of their duties thus contributing to the effectiveness of the internal control system to protect the Company's values.

In compliance with the law, all recipients must maintain an attitude based on the availability of corporate bodies and supervisory authorities.

5.1 HUMAN RELATIONS

In general with reference to:

- Staff selection:

Appraisal of staff to be hired, or of contractors, is carried out based on matching the candidates' profiles with those sought and internal requirements, offering equal opportunities for all stakeholders. The information requested is strictly linked to checks of the aspects covered in the professional, psychological and-attitude profile requirements with respect for privacy and the opinions of the candidate.

For the selection procedure, Top Management adopts appropriate measures to avoid favouritism and concessions of all kinds and makes a careful selection based, in addition to the mandatory aspects, also on the professional characteristics required for award of the assignment concerned.

- Establishment of the employment relation

Staff are recruited under a regular employment, professional service or internship contract: no form of irregular work is tolerated.

- Integrity and protection of the person

In the context of human resources management and career advancement, as well during the selection phase, the decisions taken are based on the match between the required profiles and those of the applicants and/or on the basis of merit. Access to roles and assignments is based on skills and abilities. In addition, as is compatible with general efficiency at work, flexibility in the organization of work facilitates support for staff on maternity leave or who have childcare responsibilities.

- Optimizing the potential and training of human resources

The Company makes information and training tools available to its people with the aim of optimizing their specific skills and the upkeep of staff's professional value. Institutional training is provided, provided at certain points in professional life, specific to the person (example: for new hires there is an introduction to the business) and ongoing training dedicated to operational staff (example: training on safety in the workplace, on the management 231 model and the Code of Ethics).

5.1.1 OCCUPATIONAL HEALTH AND SAFETY

Fasac ensures that all its work activities comply with current regulations on occupational safety. It is also committed to protecting vulnerable staff, such as young workers, new mothers and people with disabilities, from risks associated with night work or hazardous conditions. The Company constantly promotes training and updating on best safety practices.

Fasac is committed to offering a working environment that protects the health and safety of staff, promoting a shared and consolidated safety culture. The aim is to prevent accidents, occupational diseases and protect all categories of staff, including vulnerable categories such as young workers, pregnant women and workers with disabilities. The Company raises risk awareness levels and promotes responsible behaviour among all staff, also seeking synergies with suppliers, external consultants and customers involved in Company activities.

In addition, Fasac takes preventive measures to protect the health of workers, ensuring that all activities are conducted in compliance with occupational safety and health regulations. In particular, the Company operates in compliance with the provisions of Legislative Decree 81/08 and subsequent amendments, which regulate occupational safety in Italy.

Principles and guidelines

- Prevention of accidents and occupational diseases:

Fasac takes all necessary measures to prevent occupational accidents and diseases. All work activities comply with national and international safety standards, and the Company constantly monitors changes in the regulations to ensure the adoption of best practices in health and safety.

- Protection of vulnerable categories:

The Company provides special protection for vulnerable categories of staff such as young workers, pregnant women and workers with disabilities. In these categories, special care is taken to avoid risks that may compromise their health, safety or physical and mental development.

- Safe working environment:

Fasac is committed to keeping all facilities in perfect condition from the standpoint of safety, in compliance with fire regulations and general provisions on safety. Equipment is regularly monitored and maintained to ensure it is safe for all employees to use. The Company takes preventive measures to protect workers from any dangerous situation.

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- General preventive measures:

The Company develops and adopts general measures for the protection of health and safety at work, including:

- Safety operating procedures:
Fasac defines the operating procedures to be followed in the event of risk situations, in order to coordinate Company activities in the field of safety and health.
 - Risk assessment:
the Company conducts a continuous assessment of health and safety risks, also incorporating factors related to the work environment and work organization.
 - Monitoring of legislative changes:
Fasac constantly monitors occupational safety and health regulations and promptly adopts all changes in the legislation.
- Risk elimination and reduction: Fasac is committed to minimizing risks according to knowledge of the risks and technical progress:
 - Risk elimination: whenever possible, Fasac takes measures to eliminate risks at source.
 - Replacement of hazardous materials: Fasac favours the use of less hazardous materials and equipment, limiting the use of chemical, physical and biological agents.
 - Reduction of risk exposure: Fasac undertakes to limit to a minimum the number of workers who may be exposed to risks, including through the rotation of tasks and the adoption of preventive measures.
 - Ergonomics and wellbeing at work: Fasac adopts the principle of ergonomics to improve work organization and working conditions, so as to reduce the risks arising from monotonous and repetitive work, which could have negative effects on the physical and mental health of employees.
 - Continuous training and information: all workers receive continuous training on occupational safety issues, including managers, supervisors, the Workers' Safety Representative (WSR) and other staff members. The training is aimed at ensuring that each employee is adequately prepared in recognising and managing risks in the workplace.
 - Emergency measures: Fasac adopts and clearly communicates the emergency measures to be implemented in the event of an accident, first aid, firefighting and evacuation of workers in situations of serious and immediate danger. The Company areas are equipped with safety signs and the systems are regularly maintained to ensure that they are ready for use in case of emergency.
 - Regular maintenance and inspection: Fasac is committed to ensuring the regular maintenance of environments, equipment and systems, with particular regard to safety devices. The equipment is maintained according to the instructions of the respective manufacturers, to ensure that it is always safe and efficient.

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- Consultation and participation of workers: Fasac promotes the consultation and active participation of workers and the RLS (Workers' Safety Representative), in order to continuously improve occupational safety standards.
- Fasac adopts codes of conduct and good practices to ensure that all activities are carried out in a safe and compliant manner.

5.1.1.1 MEASURES FOR THE PROTECTION OF VULNERABLE WORKERS

Fasac adopts specific measures to protect vulnerable workers, such as young people, those with disabilities and new mothers. These measures include flexible working hours, support if adaptations are needed in the workplace, and protection against discrimination or exploitative practices.

5.1.2 PROTECTION OF PRIVACY

Fasac is fully aware of the importance of protecting the personal data of its employees, customers, suppliers and other stakeholders. In accordance with local and international privacy laws, such as the GDPR (General Data Protection Regulation) of the European Union, the organization undertakes to collect, process and protect personal data with the utmost confidentiality and in compliance with the rights of individuals.

Specific commitments:

- Lawful and transparent processing of data: personal data must be processed in a lawful, transparent manner and collected only for specific and legitimate purposes. The Company ensures that all data operations are documented and accessible.
- Confidentiality and security: access to data is limited to those who need it for business reasons. Data must be protected by appropriate security measures, to prevent unauthorised access, disclosure or accidental loss.
- Informed consent: where necessary, the Company obtains the explicit consent of data subjects before collecting, processing or sharing their personal data. Individuals are informed of their rights regarding the processing of data and how they can exercise them.
- Staff training: Staff are trained on privacy and personal data protection laws, as well as Company procedures to ensure compliance with relevant regulations.
- Managing privacy breaches: In the event of privacy or data security breaches, the Company undertakes to follow a data breach management plan, which includes timely notification of data subjects and the competent authorities, when necessary.

Fasac is committed to maintaining and constantly updating its internal policies and procedures in order to ensure that data is processed in accordance with current legislation and that the privacy of employees, customers and suppliers is always protected.

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5.1.3. ENVIRONMENTAL PROTECTION

Fasac is mindful of its responsibility towards the environment and is committed to minimising the ecological impact of its operations. To achieve this goal, it promotes sustainable environmental policies and practices that reduce energy consumption, greenhouse gas emissions, waste and the consumption of natural resources.

Specific commitments:

- Energy efficiency: Fasac promotes the adoption of energy-efficient technologies and solutions in all its facilities, to minimize energy consumption. This includes the use of renewable energy, the reduction of energy requirements through process optimization and the use of low energy consumption devices.
- Waste management Fasac implements waste reduction, reuse and recycling policies. Employees are encouraged to minimize non-recyclable waste and follow best practices for the proper disposal of environmentally harmful materials.
- Pollution and emissions: Fasac takes measures to minimise the emission of pollutants into the air, water and soil, in line with applicable environmental regulations. This includes the implementation of technologies for wastewater treatment, the control of greenhouse gas emissions and the use of low-emission vehicles and machinery.
- Sustainability of suppliers: Fasac is committed to working with suppliers that follow sustainable practices and demonstrate their real commitment to environmental protection. The selection of suppliers takes into account their ability to meet established environmental standards and comply with regulations.
- Training and awareness-raising: Fasac promotes environmental awareness among its employees, encouraging them to participate in sustainability training programs. In addition, internal campaigns are implemented to encourage responsible behaviour, such as reducing paper, water and energy consumption.

Commitment to the environment is a fundamental value for Fasac, which is committed to constantly improving its environmental performance, reducing the impact of its activities and making a positive contribution to the community and the planet.

5.2 POWERS AND RESPONSIBILITIES

The duties, responsibilities and powers of the directors, employees and contractors are defined through specific resolutions and/or specific procedures.

These duties, responsibilities and powers must be known, accepted and respected.

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5.2.1 OBLIGATIONS FOR DEPARTMENT MANAGERS UNDER THE CODE OF ETHICS

Each department manager, identified as such in the organization chart, in the job description and/or in the delegation system, has the obligation to:

- manage observance of the Code of Ethics by those directly or indirectly under their supervision,
- set an example for employees and contractors through their own behaviour,
- ensure that employees and contractors understand that the provisions contained in this Code of Ethics form an integral part of their professional duties,
- promptly refer to their line manager or to the Supervisory Board, any reports or special requirements of persons under their supervision.

Failure by the department managers to comply with the obligations referred to in this section may result in the application of disciplinary penalties, as provided for by the system of penalties.

5.2.2 OBLIGATIONS FOR ALL EMPLOYEES AND CONTRACTORS UNDER THE CODE OF ETHICS AND THE DOCUMENTATION PRODUCED BY THE COMPANY

Each employee and contractor is required to familiarize themselves with the provisions contained in the Code of Ethics or referred to therein, as well as with the relevant legislation governing the activity carried out within the scope their duties, which constitute an integral part of each employee's professional services.

An employee or contractor who becomes aware of presumed unlawful conduct is required to communicate the information in their possession on such conduct exclusively to their line manager or to the Supervisory Board and/or to Top Management in the manner provided for by the internal system.

The administrative area adopts monitoring systems on the effective reading and understanding of mandatory legal documents by employees, contractors, etc., by means of anonymous tests, deploying the most appropriate actions to constantly increase the level of dissemination and understanding of their contents

Employees and contractors are also obliged to:

- refrain from conduct contrary to these provisions and rules,
- contact their line manager or the Supervisory Body and/or the person with delegated responsibility for management of the prevention model for the necessary clarifications on methods for application of the Code of Ethics or the reference regulations,
- promptly report to at least one of the persons indicated above any news regarding possible violations of the Code of Ethics,
- cooperate with the organization in the event of any investigation intended to check and possibly penalize possible violations.

These requirements of conduct are also required of external consultants and contractors of all kinds.

5.2.3 PROTECTION OF COMPANY ASSETS

Each recipient of this document is required to work diligently to protect the Company's assets from improper or incorrect use.

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All recipients of this document must know and implement the provisions of internal policies on occupational safety, in this regard, the Company obtained ISO 9001:2015 quality certification in 2021, creating an integrated management system for quality, safety and the environment.

Indeed, the Company is committed to training staff, monitoring performance and constantly improving the value offered to customers and stakeholders in order to guarantee integrity, confidentiality and availability to all Company stakeholders.

Information and know-how must be protected with the utmost confidentiality. The most significant data that the Company acquires or creates in the course of its activity must be considered confidential information and subject to appropriate care and attention: this also includes information acquired from and regarding third parties (customers, contacts, partners, employees, etc.).

Persons who in the performance of their duties come into possession of confidential information, materials or documents must inform their managers and top management.

During the course of the employment relation with the Company, individuals may use confidential data exclusively in the corporate interest and never for their own benefit and/or for the benefit of third parties.

5.2.4 CONFIDENTIAL INFORMATION ON THIRD PARTIES

Company staff must refrain from use of any unlawful means of to acquire confidential information about other organizations and third parties.

Those who, within the framework of a contractual relation, become aware of confidential information about other persons, will be required to use said information exclusively for the use stipulated in the contract in question.

Without proper authorization, individuals may not request, receive, or use confidential information about third parties. If you become party to confidential information about another person that is not already subject to a nondisclosure agreement or other form of protection, you should contact your own line manager for assistance in processing the information.

5.2.5 USE OF CORPORATE ASSETS

Each person is required to work diligently in order to protect corporate assets through responsible behaviour and in accordance with the operating procedures prepared to govern their use, accurately documenting said use.

In particular, all staff must:

- Use the assets entrusted to them scrupulously and sparingly.
- Avoid improper use of corporate assets that may cause damage or reduced efficiency or that is otherwise contrary to the Company's interest.
- Properly safeguard the resources entrusted to them and promptly inform the units concerned of any threats or events harmful to the Company.

With reference to computer applications, every person is expressly required to:

- scrupulously adopt the provisions of Company security policies in order not to compromise the functionality and protection of computer systems,

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- refrain from sending threatening or insulting e-mail messages or using crude language or making inappropriate comments that may cause offense to persons and/or damage to the Company's image,
- refrain from browsing websites with indecent and offensive content and in any case not related to their professional activities.

5.3 CONTRACTS AND COMMUNICATIONS TO CUSTOMERS

Contracts and communications to customers by the Company must always be:

- clear and simple, expressed in language as close as possible to that normally used by the interlocutors,
- compliant with current regulations and such as not to constitute evasive or otherwise incorrect practices,
- complete so as not to overlook any relevant aspect instrumental to the customer's decision.

5.3.1. STAFF 'S APPROACH TO CUSTOMERS

The approach adopted by staff towards customers must be based on professionalism, courtesy and availability, so that the Company can maintain and consolidate relations of trust and mutual satisfaction. Each staff member is required to follow a code of conduct that fosters a positive and constructive interaction with customers, in compliance with their needs and expectations.

Specific commitments:

- Courtesy and Respect: Employees must treat customers with respect and consideration in every interaction, listen to their requests, respond promptly to their questions, and address every situation with empathy and availability.
- Professionalism: every interaction with the customer must be managed competently, with the aim of offering appropriate solutions to requests, ensuring clarity in communications, accuracy of information and confidentiality.
- Transparency and clarity: it is essential that employees are always transparent about products, services and Company policies. They must provide clear, understandable and truthful information, avoiding any form of deception or ambiguous communication.
- Complaints management: employees must be prepared to adequately handle any complaints or grievances from customers, following a clear procedure and ensuring that any issues are dealt with seriously and promptly, seeking solutions that best meet customer needs, in compliance with Company policies.

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- Customer satisfaction: Staff are encouraged to focus on the continuous improvement of the customer experience, collecting feedback and suggestions to improve the services offered, implementing improvements based on such inputs.

Adopting respectful, courteous and professional behaviour is essential to building and maintaining long-term relations with customers, contributing to the Company's success and reputation.

5.3.2. DATA PROCESSING AND RESPECT FOR PRIVACY

Fasac is committed to ensuring maximum compliance with the regulations on the protection of personal data and privacy, treating all information concerning employees, customers, suppliers and other stakeholders with the utmost confidentiality. The processing of data must be carried out in a lawful and transparent manner for specific and lawful purposes, with total respect for the rights of the data subjects.

The processing of personal data, both internal and external, is fundamental for trust and security in business relations. Fasac, with regard to the processing of external data, undertakes to strictly comply with the regulations in force regarding the protection of personal data (in particular the GDPR) and to apply best practices to guarantee the privacy of users.

Specific commitments:

- Managing customer and partner data: the personal data of customers, suppliers and other stakeholders is treated in a manner that complies with applicable laws. The Company collects only the data necessary for the management of business relations, ensuring that each item of personal data is treated with the utmost respect and security.
- Transparency in communications with data subjects: customers and other stakeholders are always informed about how their personal data is processed, clearly specifying the purposes, the duration of storage and the rights that data subjects retain over their data.
- Security in the management of external data: Fasac adopts technical and organizational measures to protect the data of customers and other parties with whom it has business relations from unauthorized access, alterations or unintended disclosure. Measures include the use of advanced technologies such as encryption, protection of computer systems, and restricted access to data.
- Management of sensitive data: when Fasac processes sensitive data (such as health data or data belonging to particular categories), strict policies are in place to ensure that such data is only processed for explicit purposes and that the legal conditions for processing are met.
- International compliance: Fasac is also committed to complying with international privacy regulations, considering the global scope of its business operations. For example, in case of transfer

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of data outside the European Union, the measures provided for by the GDPR are adopted, such as the imposition of standard contractual clauses or the application of other appropriate guarantees.

- Rights of data subjects: Fasac ensures that the rights of data subjects (access, rectification, erasure, opposition to processing) are respected. Customers and other stakeholders can easily exercise their rights by contacting customer services or through dedicated channels.
- Ongoing privacy training: staff involved in data processing are regularly trained on how to process customer and other stakeholder data in compliance with data protection regulations. The training includes awareness on how to avoid errors in data processing and how to ensure that all operations are carried out in accordance with privacy laws.

5.4. RELATIONS WITH SUPPLIERS

Fasac recognizes the importance of establishing loyal and mutually respectful cooperative relations with all its suppliers. Suppliers are key partners for business success and, therefore, must share the organization's core values, including integrity, transparency, legality, and respect for human rights and the environment.

To ensure that suppliers operate in line with the same ethical principles adopted by the Company, strict criteria are adopted for the selection, appraisal and continuous monitoring of supplier performance.

The most relevant aspects in the management of relations with suppliers include:

- Risk assessment: The Company carries out a periodic assessment of the risks associated with suppliers, considering aspects related to quality, safety, sustainability and respect for human rights and current regulations.
- Code of Ethics: Fasac encourages suppliers to adopt codes of ethics similar to that of the Company, so as to ensure that all business partners are aligned with the principles of legality, respect for human rights and environmental sustainability.
- Monitoring of practices: Fasac is committed to actively monitoring its suppliers' compliance with ethical standards, including through Company policy reviews and ongoing dialogue with business partners.

5.4.1. SUPPLIER SELECTION AND COMPLIANCE WITH ETHICAL STANDARDS

The choice of suppliers is made on the basis of objective and transparent criteria, which consider not only the quality and reliability of the products or services offered, but also the commitment of the supplier to comply with ethical and legal standards.

Each supplier is appraised according to the following parameters:

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- Compliance with laws and regulations: It is essential that suppliers operate in accordance with local and international laws and regulations, including those relating to environmental protection, occupational safety and human rights. Legality is an essential requirement to join the Company's network of suppliers.
- Commitment to social responsibility: Fasac favours suppliers who demonstrate an active commitment to promoting social responsibility, such as respect for workers' rights, the fight against child and forced labour, and the adoption of gender equality and inclusion policies.
- Sustainability and environmental impact: environmental sustainability is a fundamental criterion for the selection of suppliers. Suppliers must adopt practices aimed at reducing their environmental impact, such as energy efficiency, responsible waste management and the use of renewable resources.
- Periodic audits and appraisals: Fasac reserves the right to carry out periodic audits to verify suppliers' compliance with the established ethical standards. These audits may cover aspects related to the quality of products/services, security, data management and compliance with environmental and social standards.
- Transparency in communications: the selection of suppliers in full transparency is essential, ensuring that all communications and decisions are documented and easily verifiable.

5.4.2. INTEGRITY AND INDEPENDENCE IN RELATIONS

Fasac is committed to maintaining integrity and independence in relations with its suppliers, to avoid conflicts of interest that may compromise ethical trading practices.

The standards that govern these relations are based on principles of transparency, loyalty and honesty, in order to avoid behaviour that may damage the Company's reputation or interests.

- Unbiased decision-making: decisions regarding the selection of suppliers must be made without any bias or undue influence from external interests or due to personal relations. Any conflicts of interest must be declared and managed in accordance with Company policies.
- Avoiding conflicts of interest: the Company takes the utmost care to ensure that there are no conflicts of interest in its relations with suppliers. For example, an employee may not have direct or indirect interests in a supplier Company, nor may they receive gifts, gratuities or benefits that may compromise their impartiality when making decisions.
- Clarity in contracts and negotiations: all contracts with suppliers must be drafted with clarity and transparency, with detailed specifications regarding the mutual obligations, payment terms, delivery times and quality standards. Negotiations must be conducted in a correct manner, without deception or unfair trading practices.
- Monitoring of long-term relations: even for long-term relations, the Company is committed to constantly monitoring the performance of suppliers, ensuring that they continue to comply with ethical standards and operate in an honest and transparent manner.

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- Mutual respect and cooperation: the Company promotes a culture of mutual respect with suppliers, based on trust and cooperation. Relations must not entail any prevarication or exploitation, but be conducted through constructive dialogue aimed at solving problems and continuously improving performance.

5.5. RELATIONS WITH PUBLIC ADMINISTRATIONS

Fasac is committed to maintaining correct, transparent and respectful relations with all Public Administrations, local authorities and public institutions, operating in full compliance with current regulations and the principles of legality, impartiality and transparency. The Company refrains from any conduct that may cause a conflict of interest or from making any recourse to practices that interfere with the regular performance of public duties.

All persons acting on behalf of Fasac must act in accordance with the laws and regulations, avoiding any form of favouritism, corruption or wrongdoing. Fasac encourages constructive cooperation with Public Administrations, promoting dialogue and cooperation for the well-being of the community and respect for civil and economic rights.

5.5.1 FAIRNESS AND LOYALTY

In the course of relations with Public Administrations, Fasac undertakes to conduct itself with the utmost fairness and loyalty. No employee, contractor or representative of the Company must ever compromise the integrity and reputation of Fasac through misleading or improper initiatives towards public institutions.

Fasac prohibits any form of corruption, improper gifts or benefits that may influence the decisions or actions of public authorities. It is the responsibility of each individual to avoid situations that may give rise even if only to a suspected conflict of interest, in particular in administrative procedures relating to concessions, contracts, licences or other authorizations. Any interaction with Public Administrations must be guided by the principles of transparency, impartiality and legality.

5.5.2 GIFTS, REWARDS AND BENEFITS

Fasac also prohibits any person in the Company from giving money or offering economic advantages or other types of benefits to representatives of the Public Administration in order to obtain positions or other advantages whether personal or corporate.

No form of gift is allowed that can be interpreted as exceeding normal commercial or courtesy practices or in any case aimed at acquiring favourable treatment in the conduct of any activity related to the Company.

In this sense, a gift is considered a "normal commercial or courtesy practice" worth less than €100.00, not to be exceeded cumulatively over the course of the calendar year.

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In particular, any form of gift to Italian and external public officials or their family members that may influence their independence of judgment in order to obtain more favourable treatment or undue benefits or advantages of various kinds is prohibited.

Gift means any type of benefit: not only material goods but also, for example, free participation in conferences, training courses, promise of a job offer etc.

The above must never be circumvented by resorting to third parties: in this regard, not only illegal payments made directly to entities or their employees but also illegal payments made to persons acting on behalf of such entities are considered acts of corruption.

For special occasions, anniversaries and/or festivities, the donation of goods is allowed as long as of a modest amount and in any case within the limits decided by the Board of Directors or the Chief Executive Officer after communication to the Supervisory Body and duly documented to allow the appropriate checks.

If a person from the Company receives explicit or implicit requests for benefits from a member of the Public Administration, they shall immediately inform the Board of Directors or the person to whom they are required to report for the adoption of appropriate checks and initiatives.

With reference to donations, the Company provides that they can be made on an exceptional basis with as sole beneficiaries, non-profit entities, whose seriousness and integrity is also recognized outside the context of the Company.

5.6 EXTERNAL RELATIONS

Fasac's external relations are aimed at promoting the Company's reputation, facilitating dialogue with the main interlocutors and building strategic alliances in line with the Company's ethical principles. Fasac is committed to maintaining responsible and transparent behaviour in its interactions with all external parties, including business partners, public bodies, trade associations, media, non-governmental organizations and other stakeholders.

External communications must reflect Fasac's mission and vision, respecting the principles of truth, transparency and impartiality. In particular, the Company ensures that any public statement, press release or marketing campaign is accurate and does not mislead or create misunderstandings vis-a-vis the public.

Every Fasac employee and representative is required to promote the Company's image with professionalism and respect for all parties involved, avoiding behaviour that may compromise trust in Fasac.

5.6.1 EXTERNAL ENFORCEABILITY OF THE CODE OF ETHICS

Anyone acting in the name and on behalf of the Company who enters into contact with third parties with whom the organization intends to undertake commercial relations or is required to have relations of an institutional, social, political or any kind with them, has the obligation to:

- inform said persons of the commitments and obligations imposed by the Code of Ethics;
- require compliance with the obligations of the Code of Ethics in the performance of their activities;
- adopt the necessary initiatives in the event of refusal by third parties to comply with the Code of Ethics or non or only partial fulfilment of the commitment to comply with the provisions contained

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in the Code of Ethics, informing Top Management or the appointed delegates and the Supervisory Body.

5.6.2 CONFLICT OF INTERESTS

All recipients of this Code must ensure that every decision made in the scope of their activities is made in the interest of the Company.

All recipients are also required to avoid any activity or situation of personal interest that constitutes or may constitute, even potentially, a conflict between their own interests and those of the organization and, in any case, must comply with the specific procedures adopted by the Company in this regard.

All recipients of the Code of Ethics must refrain from taking advantage of their relations with the Company in order to obtain preferential treatment for themselves or third parties to the detriment or disadvantage of the organization.

All employees are prohibited from taking part, directly or indirectly, in any capacity, in commercial initiatives in direct competition with the Company unless such participation has been previously notified to the competent Board of Directors and approved by the same, having heard the opinion of the Supervisory Body. In the event that situations of conflict of interests are identified, even if only potential, both internal and external to the Company's activity, each person involved is required to refrain from carrying out the conduct the subject of a conflict of interests by giving prompt notice to the SB which is responsible for assessing the existence, on a case-by-case basis, of any incompatibility or compromising situations.

5.6.3 COMPETITION - PRACTICES

For Fasac, it is of primary importance that the market is based on proper and fair competition.

The Company is committed to scrupulously observing the relevant laws and to cooperating with the market regulatory authorities.

In particular:

- it undertakes to conduct its business in compliance with the *ratio* of the law on the tasks of supplying goods and services that are entrusted to it under express agreements with public bodies, including economic entities and public equity companies;
- it competes fairly in the market respecting the rules of competition;
- it undertakes to provide correct information about its business both internally and externally or in response to legitimate requests;
- it ensures the veracity and correctness of the corporate data relating to the financial statements, reports and other official documents regarding corporate affairs.

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6 PROCEDURES FOR APPLYING THE CODE OF ETHICS

6.1 ORGANIZATIONAL PRINCIPLES

Fasac ensures that the organizational structure is based on the criterion of separation between those who decide, those who execute and those who conduct checks. In particular, the organization makes all transactions open to audit to ensure they are correctly recorded.

Fasac imposes on auditors a duty to ensure the veracity and accuracy of the data and information.

Each transaction and/or activity must be lawful, authorized, consistent, documented and open to audit, in accordance with the principle of traceability and Company procedures, fulfilling the criteria of prudence and the protection of the Company's interests.

Company procedures must allow auditing of transactions, authorization processes and their implementation. Any employee who performs transactions involving sums of money, goods or other economically assessable benefits belonging to the Company must provide reasonable and appropriate evidence to allow auditing of the aforementioned transactions.

6.2 ACCOUNTING TRANSPARENCY

The Company's accounting complies with the generally accepted principles of truth, accuracy, completeness and transparency of the data recorded as governed by Articles 2423 *bis* et seq. of the Italian Civil Code.

The recipients of this Code of Ethics undertake to refrain from any behaviour, whether act or omission, that directly or indirectly violates the regulatory principles and/or internal procedures that concern the preparation of accounting documents and their external representation.

The recipients of this Code of Ethics are also required to keep and make available, for each operation or transaction carried out, adequate supporting documentation to ensure:

- the accuracy of accounting records;
- immediate identification of the underlying characteristics and reasoning;
- easy formal and chronological reconstruction;
- auditing of the decision-making, authorization and implementation processes, the consistency and congruity as well as the identification of the various levels of responsibility;
- the recipients of this Code of Ethics who become aware of cases of omission, falsification or carelessness in the accounting records or supporting documentation are required to promptly report it to their line manager or to the SB and/or Top Management.

The Company promotes training and updating in order to make the recipients of this Code of Ethics aware of the rules (laws or regulations, internal requirements, provisions of trade associations) that govern the training and management of accounting documentation.

6.3 CHECKS AND INSPECTIONS

Fasac will ensure the availability to audit and inspection bodies, through the appropriate persons, of all necessary information as well as the facility to examine documents and submit any relevant queries.

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In addition, Fasac guarantees access to all information and documents to entitled persons and provides, through the availability of its directors and employees responsible for their duties, all the information that may facilitate the exercise of supervisory functions.

The organization prohibits its directors and employees and/or contractors from making false statements or submitting false documents or certifying untrue situations, including through computer systems, with the aim of improperly receiving public funds and/or obtaining and retaining any benefits.

6.3.1 SUPERVISION OF IMPLEMENTATION OF THE CODE OF ETHICS

It is primarily the responsibility of the directors and managers to give substance to the principles and contents of the Code of Ethics, taking responsibility internally and externally, and by their conduct setting an example for their employees in compliance with the Code of Ethics.

The Supervisory Body is responsible for:

- monitoring initiatives for the dissemination of knowledge and understanding of the Code of Ethics, verifying, in particular, the correct deployment of communication and training activities;
- monitoring application of the Code by all stakeholders, including through careful consideration and evaluation of any reports received;
- reporting any violations of the Code by the Company's staff to the competent Company Departments, in order to take the necessary corrective measures;
- fulfilling, where required, an advisory function in the course of disciplinary proceedings;
- suggesting the revision/updating of Company policies and procedures in order to ensure their consistency with the Code;
- proposing, where necessary, a revision of the Code.

The SB will maintain the requirements for its autonomy and independence, assume powers of investigation and control as well as the right to adopt initiatives in fulfilment of its assigned functions.

6.3.2 REPORTING PROBLEMS OR SUSPECTED VIOLATIONS

To report any adverse events or behaviour that could contradict what is set forth in the Code of Ethics and in the principles described in this policy, staff can:

- Contact their line manager.
- Contact the Human Resources Manager, who will analyse the report, possibly hearing the whistleblower and the person responsible for the alleged violation.

In the event of suspected violations relating to practices such as forced labour, child labour, discrimination, harassment, violence, violation of the rights to freedom of association and collective bargaining, as well as unsafe working conditions, it is essential that such reports are treated with the utmost urgency and seriousness.

If the report also concerns crimes pursuant to Legislative Decree 231/01 (administrative liability of legal persons), it must also be forwarded (through the channels provided for in Model 231) to the Supervisory

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Body, which will analyse the report, possibly hearing the whistleblower and the person responsible for the alleged violation.

If the report also concerns crimes pursuant to Legislative Decree 24/23 (Whistleblowing), it must also be forwarded (through the channels provided for by the reference procedure) to the Managing Body, which will carry out an analysis of the report, possibly listening to the whistleblower and the person responsible for the alleged violation.

Reports will be treated confidentially and with the utmost respect for the privacy and integrity of the parties involved, avoiding any form of retaliation.

Each contractor or employee is obliged to:

- actively cooperate in the investigation of possible violations of Company ethical and regulatory principles, ensuring the adoption of appropriate corrective measures in case of need,
- take immediate corrective action if the situation so requires, in line with Company policies on safety, staff welfare and compliance with human rights and environmental regulations,
- prevent any type of retaliation against those who report unlawful behaviour or violations, in particular by protecting workers from punitive actions in the event of reporting abuses related to practices such as forced labour, child labour, discrimination or failure to respect workers' rights.

The Company undertakes to treat all reports seriously and to ensure that the necessary corrective measures are taken to eliminate any form of violation of workers' rights and the environment, promoting an ethical, safe and respectful working environment respectful of human rights and the environment.

The applicable disciplinary procedures, which include the immediate cessation of practices in violation of the requirements, are clearly communicated to all workers, so that they are aware of the corrective actions and any applicable penalties.

6.3.3 DISCIPLINARY MEASURES FOLLOWING VIOLATIONS

The provisions of this Code of Ethics are an integral part of the contractual obligations entered into by staff as well as by the persons conducting business relations with the Company.

Violation of the principles and forms of conduct indicated in the Code of Ethics compromises the relation of trust between the Company and the perpetrators of the violation, whether they are directors, employees, consultants, contractors, customers or suppliers.

For details of the disciplinary system and penalties, please refer to Model 231 adopted by the Company.

In general, proceedings in the event of violations will be conducted as follows:

- with regard to employees (including members of corporate bodies and the SB) through appropriate disciplinary measures, regardless of the possible criminal relevance of the conduct and the bringing of criminal proceedings in cases where the conduct constitutes a crime. In particular, the penalties will comply with the rules and logic applicable to the employment contract. Disciplinary measures range from reminders or reprimands to suspension without pay, demotion and, in the most serious cases, dismissal.

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Before a disciplinary measure is taken, the person concerned is given the opportunity to explain their behaviour both verbally and in writing.

- With reference to consultants, contractors, customers, suppliers and other persons having contractual relations with the Company, specific methods of termination of the contractual relation will be implemented in cases of proven violation of this Code.

The foregoing is without prejudice to any compensation for damages that the Company may sustain as a result of the violation by the aforementioned parties of the provisions contained in the Code of Ethics.

6.4. PUBLIC OFFICE

Fasac recognizes the importance of guaranteeing integrity and transparency in all relations with the Public Administration and with those who work in the capacity of public officials. The Company undertakes to avoid any conflict of interests or situations that may compromise legality and impartiality in interactions with public bodies, local authorities, government institutions and other entities holding public office.

In particular, Fasac prohibits its employees, contractors and representatives from accepting assignments or offices that may generate conflicts with corporate interests, with the proper performance of public services or respect for the principles of transparency and legality. No person involved in business activities may undertake public service assignments without a prior assessment of compatibility with their business duties and without all precautions having been taken to avoid potential conflict of interests.

Fasac totally abstains from any form of corruption or abuse of position, whether direct or indirect, in contexts related to public office, and undertakes to strictly comply with all applicable regulations and codes of ethics. Fasac employees and contractors are required to act impartially, fairly and transparently in any interaction involving public officials or authorities. Any situation that may present even a merely potential conflict of interest must be immediately reported to Company managers to ensure appropriate management.

In the case of assignments as consultants or public service providers, Fasac guarantees that the services are provided fairly and without any form of favouritism or undue pressure. The procedures for selecting, assigning and managing public appointments are always conducted in full compliance with current regulations and the principles of transparency, impartiality and legality.

Finally, Fasac is committed to training its employees and contractors in the regulations and best practices relating to public service assignments, promoting a corporate culture that promotes respect for civil and economic rights and contributes to reinforcing trust between the public and private sectors.

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6.5 CONFIDENTIALITY

The recipients of the Code of Ethics, i.e. all contractors and employees, are required to observe the utmost confidentiality regarding all information, documents, studies, initiatives, projects, contracts and Company data that are entrusted to them in the course of their professional service. This obligation of confidentiality also extends to all information relating to workers' rights, occupational safety practices, Company environmental protection policies, and how workers are managed, both when reporting violations and when implementing measures to ensure compliance with legal and international regulations.

Fasac undertakes to deploy appropriate measures to protect the sensitive and confidential information managed, adopting adequate physical, technological and organizational security systems to prevent unauthorised access to such information. In particular, access to Company information and sensitive data, including those relating to employees, contracts, working conditions, and the management of human rights and environmental protection practices, is limited to authorised staff, who must be adequately trained and made aware of the risks arising from improper management of such data.

In addition, the Company is committed to protecting all information relating to whistleblowing processes and to ensuring that such reports are treated confidentially, with the utmost respect for the identity of the whistleblowers and without any risk of retaliation. Information collected and processed regarding situations of non-compliance with the principles of the Code of Ethics (such as discrimination, forced labour, violations of workers' rights and of environmental regulations) must be handled with the utmost discretion, always protecting the privacy of the parties involved.

Finally, all Company information must be used exclusively for the purposes provided for by legislation, Company policies and employment contracts, and may not be disclosed to third parties, except in cases where this is required by law or in case of a requirement for the protection of human rights, workers or the environment.

6.5 PUBLICATION, COMMUNICATIONS AND TRAINING

This Code forms an integral part and implements the Model 231 adopted by the Company in order to prevent crimes committed in the interest or for the benefit of the organization by the persons referenced in Legislative Decree no. 231/01.

In order to prevent violations of current regulations, as well as of the Code of Ethics, the Company provides for the adoption of specific procedures by all those involved in the operational process, aimed at identifying the parties responsible for the decision-making and authorization procedures and performance of the operations proper.

This Code of Ethics is brought to the attention of all internal and external persons involved in any way in the business of the Company, through specific communication and training initiatives and also, through publication on the Company's website.

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6.6 OPERATING PROCEDURES AND DECISION-MAKING PROTOCOLS

An integral part of the Model 231 adopted by the Company is this Code of Ethics which has been developed to prevent the commission of crimes identified by Legislative Decree no. 231/01.

Fasac provides for the adoption of specific procedures by all those involved in the operational process, aimed at identifying the parties responsible for the decision-making and authorization procedures, and performance of the operations themselves.

6.7 SYSTEM FOR DELEGATION OF POWERS TO PROXIES

Apart from the persons already qualified, Fasac makes use of a system of proxies on the basis of which certain activities can only be carried out by persons expressly authorised to do so because they have power assigned by means of a specific official proxy and/or notarial power of attorney.

Individual operations must be carried out in the various phases by different persons, whose authority is clearly defined and known within the organization in order to avoid unlimited or excessive powers being awarded to individuals.

7 FINAL PROVISIONS

7.1 CONFLICTS WITH THE CODE OF ETHICS

In the event that the provisions of this Code of Ethics are in conflict with those established in internal regulations or Company procedures, the provisions of the Code of Ethics shall prevail. Fasac is committed to ensuring that all Company policies comply with the ethical principles expressed in the Code, which reflect respect for the fundamental rights of workers, the protection of dignity and equality, in line with international and local regulations. In particular, the Code of Ethics applies to avoid forced labour, discrimination, violence, exploitation of children and child labour, ensuring that working conditions are safe and respectful of the rights of all workers, regardless of their origin, gender, ethnicity, disability, family status, or other.

7.2 PROCEDURE FOR APPROVAL AND AMENDMENTS

Any amending, supplementing or updating of this Code of Ethics must be approved by the Board of Directors (BoD) after consultation with the Supervisory Body (SB).

The SB has the task of periodically monitoring regulatory developments, both national and international, and Company practices, in order to propose amendments of the Code that reflect any legislative, technological or corporate changes and that will contribute to the continuous enhancement of human rights, working conditions and corporate social responsibility.

The Board of Directors examines the amendments proposed by the SB and, if it deems them appropriate, resolves on making them immediately operational. Changes will be promptly communicated to all recipients of the Code, in order to ensure that all workers are adequately informed and able to comply with the new provisions. In doing so, the Company ensures that Company practices are always in line with the core values

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of non-discrimination, respect for workers' rights, gender equality, safety and health in the workplace, and that preventive measures are implemented to prevent any form of abuse, harassment or violence.

7.3 PERIODIC REVIEW OF THE CODE OF ETHICS

The Fasac Code of Ethics is a constantly evolving document, intended to reflect the needs of the Company, current regulations and constantly changing ethical standards.

The revision of the Code of Ethics is therefore an ongoing process that guarantees its updating and compliance with both national regulations and international ethical standards, so that the principles of transparency, integrity, social responsibility and sustainability are always adapted to the Company's needs and expectations.

Fasac is committed to regularly reviewing the Code of Ethics to ensure it remains aligned with applicable national and international regulations, as well as best practices regarding corporate social responsibility, human rights, occupational health and safety, environmental protection, as well as anti-corruption measures and transparency. Any changes to national or international regulations that affect business practices will entail a revision of the Code, to ensure its full compliance and alignment with legal developments and changes of the global context.

The review process will take place with the assistance of an internal audit committee and, if necessary, with the support of external consultants, experts in legal, ethical and social responsibility matters. The changes made to the Code of Ethics will be approved by the Company management and subsequently communicated to all Fasac employees, contractors and stakeholders, ensuring timely and clear communication of the changes.

In particular, revisions to the Code of Ethics will focus on:

- adaptation to national and international regulations: Fasac will ensure that the Code of Ethics always complies with national and local laws and regulations, including on the protection of workers' rights, occupational safety, environmental protection, anti-corruption and consumer protection. It will also be aligned with international standards, such as the conventions of the International Labour Organization (ILO), the United Nations principles on human rights and the Sustainable Development Goals (SDGs).
- Adaptation to global best practices: Fasac is committed to following international best practices, such as those established by the OECD, the ISO guidelines for ethical management and Corporate Governance, as well as complying with industry standards and international conventions that promote social responsibility and sustainability.
- Continuous improvement and inclusivity: the revision of the Code will be based on a continuous improvement process, with insofar as feasible, the involvement of employees, external stakeholders and business partners. Fasac encourages the participation of all stakeholders, facilitating the

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emergence of useful observations and suggestions on keeping the Code updated and aligned with evolving social and ethical expectations.

Any revision, amendment or update of the Code of Ethics will be formalised and communicated in a clear, timely and transparent manner to all staff, as well as to all external parties with whom Fasac interacts.

The Company is committed to ensuring that every employee, contractor and external interlocutor fully understands the changes made and the implications arising from them. Fasac will take effective measures to keep everyone constantly informed and up-to-date on developments and changes to the Code of Ethics, thus ensuring continuous alignment with Company and ethical standards.

Finally, Fasac promotes an environment of shared responsibility, so that each individual contributes to the implementation of the values contained in the Code of Ethics and to the achievement of the Company's objectives or ethical and regulatory improvements.