

IDRA S.r.l.

CODE OF ETHICS

Revision 10

Document approved by Management with resolution dated October 2025

TABLE OF CONTENTS

0	Introduction.....	4
0.1	FORECO Project	4
0.2	Foundry Star Alliance	5
0.3	Capillarity of commitments	5
1	Scope of Application.....	6
2	General Principles	7
2.1	Compliance with the Law	7
2.2	Honesty and Fairness	7
2.3	Respect for Human Rights	7
2.4	Impartiality and Equal Opportunities	7
2.5	Protection and Promotion of Diversity	8
2.6	Prevention of Abuse, Discrimination and Mobbing	8
2.7	Transparency and completeness of information	8
2.8	Confidentiality of information.....	8
2.9	Preparation of Reliable Financial Statements.....	9
2.10	Prevention of money laundering	10
2.11	Prevention of corruption.....	10
2.12	Provisions against receiving stolen goods, use of money, goods or benefits of illegal origin, as well as self-laundering.....	11
2.13	Respect for fair competition	11
2.14	Management of Intellectual and Industrial Property	11
2.15	Drafting of documents and contracts	12
2.15.1	Document storage and destruction	12
3	Criteria of Conduct in Relations with Collaborators	13
3.1	Human Resources	13
3.2	Staff Selection.....	13
3.3	Employment Relationship	13
3.4	Personnel Management.....	14
3.5	Use of Company Assets	15
3.6	Health and Safety	15
3.7	Drugs and Alcohol	16
3.8	Privacy and personal data protection	16
3.9	Integrity, protection and equal opportunities	17
3.10	Prevention of Discrimination and Harassment.....	17
3.11	Prevention of conflicts of interest.....	18
3.12	Employee Responsibilities	18
3.13	Whistleblowing	19
4	Criteria for Conduct in Customer Relations.....	21
4.1	Sales Contracts	21
4.2	Behavioural Style with Customers and Customer Satisfaction	21
4.3	Product and Service Quality	21
4.4	Insurance	22
5	Criteria for Conduct in Relations with Suppliers	23
5.1	Compliance with Laws	23
5.2	Supplier Selection	23
5.3	Protection of ethical aspects in supply.....	24
5.4	Prohibition on the sale and purchase of counterfeit goods	24
5.5	Contracts and other legal documents	25
6	Criteria of Conduct in Relations with Shareholders and Banks	26
6.1	Corporate Governance	26
6.2	Management	26
6.3	Sole Director	27
6.4	Board of Statutory Auditors.....	27
6.5	The Independent Auditors	27
6.6	Financial Reporting	27
6.7	Enhancement of Owner Investment.....	27
7	Environmental Conduct Criteria	28

7.1	Reduction of Energy Consumption in the Factory	29
7.2	Low Energy Consumption Solutions for Products.....	29
7.3	Monitoring and Reduction of Water Consumption	29
7.4	Water Reuse and Wastewater Management	30
7.5	Reduction of Greenhouse Gas Emissions	30
7.6	Control and Reduction of Atmospheric Emissions	30
7.7	Sustainable Management of Air Conditioning Systems	31
7.8	Waste Reduction and Recycling Promotion.....	31
7.9	Noise Emission Control and Reduction	31
7.10	Protection of Biodiversity.....	32
7.11	End-of-Life Product Management	32
8	Criteria for Conduct Towards Other Parties	33
8.1	Community	33
8.2	Public Administration, Institutions and Authorities	33
8.3	Political Parties, Trade Unions and Associations.....	34
8.4	Contributions and Sponsorships	34
8.5	Gifts, Complimentary Items, Benefits.....	34
9	Communication and Training	35
9.1	Communication Obligations	35
10	Violations of the Code of Ethics.....	36
11	Final Provisions	37
11.1	Implementation of the Code of Ethics and Controls.....	37
11.2	Annexes	37

0 Introduction

Ethical values are fundamental to IDRA; they define our past and our future. These values cannot and must not be forgotten in the conduct of business: our goal is to achieve excellent results, but in an ethical manner.

Having a past rich in success as a starting point should be a source of pride for everyone, especially if these successes have been achieved by applying the ethical principles that characterise a civilised and advanced society, of which we believe ourselves to be a part.



The founding value of IDRA S.r.l. throughout its industrial history is undoubtedly continuous technological innovation, which identifies it as a market leader in product innovation.

Innovation is in our DNA. IDRA offers turnkey solutions for the die-casting world: as one of the leading manufacturers of die-casting machines, IDRA is synonymous with continuous development and production of high-performance machines and their automation.

To support this, the Idra Technical Centre was also founded, offering its customers a wide range of training courses on IDRA products and technology, as well as technological seminars on products and process innovation.

0.1 FORECO Project

Through the FORECO project, IDRA is also committed to changing the mindset of generations who were used to dirty and inefficient foundries.

The FORECO project is inspired by the European Union's recent commitments to reduce greenhouse gases by 40% by 2030 and reduce emissions from automotive products. Idra will commit its resources through a collaboration in the FSA (Foundry Star Alliance) to help the aluminium die-casting industry achieve these goals.

The pillars of the project are:

1. Using the collective resources of the FSA to develop new solutions for energy-efficient production.
2. Reducing environmental contamination and recovering energy by following the KMA philosophy.
3. Reducing the energy consumption of die-casting machines through the efficient use of electricity.
4. Using only responsible raw material suppliers.
5. Supporting research and development into the use of secondary alloys and actively reducing the use of primary aluminium.
6. Collaborate with our partners to reduce the amount of release agents needed for production.

With the aim of:

- **Achieve** cleaner and more energy-efficient production of automotive products that reduce emissions.
- **Minimising** the impact of Idra's production on global warming and pollution.
- **Produce** non-polluting equipment that maximises the efficient use of resources such as electricity and gas without polluting the environment.
- **Help** the automotive community achieve emission reduction targets and improve safety for our children.

0.2 Foundry Star Alliance

Foundry Star Alliance is a group of leading companies in their specific fields of activity that have decided to collaborate and join forces, seeking to be the best support for fuelling the rapid growth of global HPDC light alloy markets.

The global approach of OEMs requires a level of knowledge and skill that cannot be found in a single company. FSA members collaborate and pool their combined resources and specific technology, resulting in the best reliable, integrated and automated high-pressure die casting production cell on the market.

FSA members are committed to promoting the use of HPDC technology for light alloys through various activities such as presenting joint papers at technical conferences, conducting training courses, participating in all major industry trade shows and organising targeted events with the specific aim of supporting the growth of the HPDC foundry industry.

The methods chosen to achieve FSA's shared objectives are:

- Innovation: combining resources and specific technology to move forward faster and stronger.
- Time to market: working together to anticipate the future and be the first to reach the market.
- Green future: FSA partners value the environment and are working towards a better future better future for our planet. Together, we can do more.
- : through our diverse skills and expertise, we are able to provide solutions to solve all of our customers' different challenges.

0.3 Capillarity of commitments

Therefore, in order to clearly and transparently define the set of values that inspire it to achieve its objectives, our Company has drawn up this Code of Ethics, compliance with which is essential for the reliability, reputation, image and proper functioning of the Company itself.

Our Company requires all employees and all those who cooperate in the running of the business to undertake to observe and enforce, within the scope of their duties and responsibilities, the company rules and precepts set out in this Code of Ethics, as outlined in terms of responsibilities in S050203 - Company Organisation Chart, attached hereto.

Under no circumstances shall the belief that one is acting for the benefit or in the interests of the Company justify the adoption of conduct that conflicts with the principles of this Code of Ethics or with company policy, S050201 – attached hereto.

1 Scope of Application

Directors, employees, collaborators, even if occasional, agents and brokers must comply with the principles and provisions of the Code of Ethics, protecting, through their conduct, the respectability and image of the Company and preserving the integrity of the company's assets.

In particular, the Company's management is required to be guided by the principles of the Code of Ethics when setting the Company's objectives, proposing investments and implementing projects, and in general, in any decision or action relating to the management of the Company itself.

Similarly, managers, in carrying out their management activities, must be guided by the same principles, both within the Company, thus strengthening cohesion and a spirit of mutual collaboration, and in their dealings with third parties who come into contact with the Company.

Employees and non-subordinate collaborators of the Company, as well as business partners and all those who have contractual relationships with the Company, are required to adapt their behaviour to the provisions of this Code of Ethics.

The Company undertakes to disseminate and promote awareness of the principles and rules contained in the Code of Ethics among its recipients through specific communication activities.

In order to promote the full application of the Code of Ethics, the Management, within the scope of its responsibilities provided for by law, it will also:

- constantly monitor the application of the Code of Ethics by the parties concerned, including through the acceptance of any reports;
- reporting any confirmed violations of the Code of Ethics to Management;
- providing, where necessary, for the periodic review of the Code of Ethics;
- propose or apply appropriate sanctions in the event of violations.

The scope of application may develop and evolve in line with market developments, the expectations and interests of stakeholders and corporate risks, as identified and evident in S040001 - Context Analysis, Internal Parties, Risks, with annual updates.

2 General Principles

2.1 Compliance with the Law

The Company considers compliance with the laws and regulations in force in Italy and in all countries where it operates to be an essential principle.

In the course of their professional activities, management, employees, collaborators, even if occasional, agents, brokers and any other person who may act in the name and on behalf of the Company are required to diligently comply with applicable laws, the Code of Ethics and internal regulations.

Maintaining certification of integrated management systems in accordance with the following standards:

- UNI EN ISO 9001: 2015
- UNI EN ISO 14001: 2015
- UNI ISO 45001: 2018

Compliance with the principles associated with the standards:

- SA 8000 : 2014
- UNI ISO 26000: 2010
- UNI Pdr 125: 2022

Reinforced by first and second party audits on an annual basis, these standards demonstrate the organisation's ongoing commitment in this field and are a decisive factor.

2.2 Honesty and Fairness

Relationships with the Company's stakeholders are based on criteria and conduct of fairness, collaboration, loyalty and mutual respect.

Honesty is the fundamental principle for all the Company's activities and is an essential element of corporate management. Under no circumstances can the pursuit of personal or Company interests justify dishonest conduct.

The procedures of the integrated management system, with particular reference to

- P0701 - Communication Participation Consultation
- P0702 - Training Awareness Competence
- P0707 - Onboarding
- P0801 - Supplier Selection, Evaluation, Qualification - Procurement
- P0812 - Procurement
- P0817 - Access

As well as the attached associates and intermediate controls, these constitute a reinforcing element of such evidence.

2.3 Respect for Human Rights

IDRA S.r.l. promotes and supports international human rights laws and condemns the use forced labour and the exploitation of child labour.

All laws to combat human trafficking and slavery are observed, and we require that our customers, suppliers and business partners observe them as well.

2.4 Impartiality and equal opportunities

The Company is committed to avoiding any discrimination based on age, gender, sexuality, health status, race, nationality, political opinions and religious beliefs in all decisions that affect relations with stakeholders.

2.5 Protection and promotion of diversity

IDRA S.r.l. is committed to promoting an inclusive workplace with equal employment and advancement opportunities for all qualified individuals, where employees can reach their full potential.

The diversity of our employees is a strength that is encouraged and supported throughout the entire company.

IDRA S.r.l. prohibits behaviour that negatively excludes an employee or group of employees on the basis of gender, age, ethnicity, national origin, religion, marital status, sexual orientation or identification, disability, illness, genetic information or any other characteristic protected under applicable laws.

All aspects of the employment relationship, such as recruitment, assignment to a position, promotion, remuneration, disciplinary action and termination of employment, must be implemented regardless of the aforementioned characteristics.

2.6 Prevention of abuse, discrimination and bullying

IDRA S.r.l. supports and promotes a workplace free from abuse, discrimination and harassment of any kind.

IDRA S.r.l. does not tolerate offensive behaviour or abuse in the workplace, including unwanted sexual advances, requests for sexual favours, and other verbal or physical conduct that is abusive or discriminatory.

2.7 Transparency and completeness of information

IDRA S.r.l.'s reputation depends on its ability to provide accurate and consistent information to the public, including current and potential customers.

The Company undertakes to inform all stakeholders in a clear and transparent manner about its situation and performance, without favouring any interest group or individual.

The Company's communication with its stakeholders (including through the press, conferences, seminars and round tables) is based on respect for the right to information.

Under no circumstances is it permitted to disclose false or biased news or comments.

All communication activities comply with laws, rules and professional conduct practices, and are carried out with clarity, transparency and timeliness, safeguarding, among other things, price-sensitive information and trade secrets.

We are all responsible for safeguarding this reputation, and it is therefore imperative that Recipients only prepare information on behalf of the Company with the prior authorisation of the relevant officers.

The text of this Code of Ethics will be available on the website www.idragroup.com and also on the company server, so as to allow maximum accessibility.

The procedures of the integrated management system, with particular reference to

- P0701 - Communication Participation Consultation
- P0704 - Internal & External Documentation
- P0705 - IT Systems HW and SW

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

2.8 Confidentiality of Information

IDRA S.r.l. dedicates significant human and financial resources to the creation of innovative processes and ideas in the technical, scientific, financial and business fields.

All this information represents valuable assets that must be protected with the utmost care.

It is essential to maintain the confidentiality of the Company's trade secrets and confidential information.

Trade secrets may include confidential information relating to the development of systems, processes, services, products, analysis methods, productivity models, performance indicators, financial plans, strategic and expansion plans, know-how and technology, as well as other information relating to customers and operations.

If it is necessary to disclose confidential information to third parties, the parties involved must sign a Confidential Disclosure Agreement (CDA) before the information is shared.

The CDA does not exempt us from our responsibility to act prudently when deciding what information to disclose. Failure to document the exchange of information or any breach of the provisions of the CDA may expose the Company to loss of protection of its information or claims for compensation.

It is essential for IDRA S.r.l. to take the necessary measures to protect the confidentiality of the information provided by our customers, suppliers and business partners. To this end, Recipients are strictly prohibited from appropriating or taking advantage of any confidential information they may have learned from a third party in the course of the business relationship, or from violating or plagiarising the intellectual property rights (including patents, copyrights, trademarks or trade secrets) of a third party.

The Company ensures the confidentiality of the information in its possession and compliance with personal data regulations. All information available to the Company is treated with respect for the confidentiality and privacy of the individuals concerned.

In this regard, each employee shall:

- Acquire and process only data that is necessary and directly related to their duties;
- Store such data in such a way as to prevent unauthorised third parties from gaining access to it;
- Communicate and disclose the data within the scope of established procedures or with the prior authorisation by the person delegated to do so and in compliance with EU Regulation 2016/679 (known as GDPR)
- Determine the confidential and private nature of the information in accordance with the relevant procedures;
- Ensure that there are no confidentiality restrictions arising from relationships of any kind with third parties.

The Company's employees are required not to use confidential information for purposes unrelated to the performance of their duties.

The procedures of the integrated management system, with particular reference to

- P0705 - HW and SW IT Systems

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

2.9 Preparation of Reliable Financial Statements

IDRA S.r.l. is committed to always preparing accurate and truthful financial reports.

We must ensure that our business operations are properly accounted for in accordance with applicable accounting regulations.

Periodic audits carried out by leading external companies (PwC Italy, for the certification of the Financial Statements) demonstrate our ongoing organisational efforts to comply with these requirements.

2.10 Prevention of money laundering

IDRA S.r.l. undertakes to comply with all laws on the prevention of money laundering that prohibit companies from accepting or processing proceeds from criminal activities.

IDRA undertakes to pay particular attention to preventing the laundering of money derived from illegal or criminal activities and conducts its business in full compliance with current anti-money laundering regulations and the provisions issued by the competent authorities for the prevention of money laundering.

The Company expressly prohibits participation in any activity or transaction designed to conceal the nature and origin of money connected with criminal activities (such as corruption, terrorism, drug trafficking, etc.) in legitimate commercial activities where the actual origin of the funds cannot be identified.

The same applies to the fight against self-laundering offences.

Periodic audits carried out by leading external companies (PwC Italy, for the certification of the Financial Statements) demonstrate the constant organisational effort to comply with these elements.

2.11 Prevention of corruption

IDRA S.r.l. undertakes to conduct its activities free from the undue influence of any extortion and corruption/illicit influence, including between private individuals.

In accordance with the anti-corruption regulations adopted, any form of corruption is prohibited, whether towards public officials, public service employees or private individuals.

It is not permitted to deliver, or promise to deliver, money, gifts, gratuities and courtesies (where permitted by applicable law), or other benefits to managers, officials, representatives or employees, or their relatives or collaborators, of public institutions and/or private companies and/or entities (e.g. customers/suppliers), both Italian and foreign, unless they are of modest value and proportionate to the case and, in any case, such that they cannot be considered as a means of obtaining undue advantages for the Company.

Promises and/or payments of other possible benefits or payments to persons belonging to the public administration, persons in charge of a public service and/or any natural/legal person/entity (whether public or private) are also prohibited. No one shall offer, promise or grant, including through their employees, associates or third parties, benefits or other advantages (money, gifts and/or invitations to events not strictly related to the pursuit of the company's objectives) to employees or partners of the Company, including their relatives or collaborators.

The Company's employees and collaborators, including anyone acting on its behalf, may not receive money, gifts or other benefits from any person with whom they have business relations, unless they are of modest value and are not accepted for the purpose of obtaining improper facilities/favours/other benefits.

It is also forbidden to offer or accept any object, service, benefit or favour of value in order to obtain or grant more favourable treatment in relation to any relationship with the Public Administration, as well as any relationship with private individuals.

It is forbidden to indulge, participate in, or otherwise follow up on a public official or public service employee who, abusing their position or powers, induces someone to give or promise unduly, to them or to a third party, money or other benefits. In the case of participation in tenders, calls for bids, or competitions with the Public Administration, the Company must operate in compliance with industry regulations and proper commercial practice.

All of the above rules of conduct to be observed in relations with the Public Administration must also be observed with regard to the bodies of certifying authorities and officials of the European Union, and/or any other public and/or private body.

Periodic audits carried out by leading external companies (PwC Italy, for the certification of the Financial Statements) demonstrate the constant organisational effort to comply with these elements.

2.12 Provisions against receiving stolen goods, use of money, goods or benefits of illegal origin, as well as self-laundering.

Receiving stolen goods means purchasing, receiving or concealing money or goods originating from any crime in order to obtain a profit for oneself or others, while money laundering means the realisation of illicit proceeds through financial and accounting transactions.

It is forbidden for directors, councillors, attorneys, employees, collaborators and/or any other person acting on behalf of the Company to engage in conduct, and/or even merely attempt and/or organise/plan, and/or even act in concert, with the aim of committing offences relating to money laundering, self-laundering, receiving stolen goods of illicit origin and their reuse.

Periodic checks carried out by leading external companies (PwC Italy, for the certification of the Financial Statements) demonstrate the constant organisational effort to comply with these elements.

2.13 Respect for fair competition

IDRA S.r.l. promotes free competition as the best way to achieve progress in the interests of consumers and public health.

The fairness of our relationships with our competitors promotes customer confidence. In accordance with the free market and antitrust laws of the countries in which the Company operates, IDRA S.r.l. is committed to competing fairly and in the spirit of promoting free competition. We encourage collaboration with various companies, giving them the opportunity to present their products, services and expertise to IDRA S.r.l.

This point is particularly important in relation to IDRA's operations in emerging markets. The Company is committed to carrying out adequate checks on the commercial and professional reliability of suppliers, customers and commercial/financial partners in order to verify their respectability and the legitimacy of their activities.

This includes small businesses and those owned by women, minorities, veterans and people with disabilities. Suppliers are selected based on price, quality, delivery, diversity and reputation, as well as their commitment to environmentally friendly business practices and ethical principles.

2.14 Intellectual and Industrial Property Management

IDRA S.r.l.'s intellectual property rights (trademarks, logos, copyrights, trade secrets, know-how) are among our most valuable assets.

Inappropriate and/or unauthorised use may result in their loss or, in any case, a serious loss of value.

All intellectual property rights of the Company must be respected, and no trademarks or other protected information or property of the Company may be used for any business or entrepreneurial activity without prior written authorisation.

Similarly, the intellectual property rights of third parties must be respected. Inappropriate use of third-party intellectual property may expose the Company and its employees to criminal and civil penalties.

IDRA S.r.l. takes appropriate measures and initiatives to protect its intellectual property and not to infringe on that of others. In particular, the Company undertakes to:

- Use only creative ideas or works (such as, by way of example, texts, illustrations, drawings, etc.) of which it has exclusive ownership, including by virtue of compensation and/or reimbursements agreed with third parties through contractual documents;
- Use trademarks that are the exclusive property of and/or whose use is available to the Company through a legitimate title to use.

In its relations with suppliers, the Company requires them to guarantee that the goods and their intended use do not infringe the industrial property rights (trademarks and patents) of third parties.

In such relationships, the company takes appropriate measures to indemnify against any claims, legal action and requests for compensation that may be brought by third parties due to acts of unfair competition, infringement of patents or patent applications, trademarks or registered designs, and industrial and intellectual property rights relating to raw materials, semi-finished products, finished products and services purchased from third parties.

Under no circumstances is it permitted to:

- Counterfeiting or altering patents, trademarks and distinctive signs, whether national or foreign, of other people's industrial products;
- Using, in any form or manner, trademarks, patents, names and other distinctive signs for which the Company does not hold exclusive ownership and/or legitimate title to use;
- Marketing intellectual property or industrial products with patents, trademarks or distinctive signs that are likely to mislead the buyer as to the origin, provenance or quality of the work or product.

The procedures of the integrated management system, with particular reference to

- P0704 - Internal & External Documentation
- P0803 - Design and Development
- P0805 - Production
- P0806 - Testing, Checks and Final Inspections
- P0807 - Assistance
- P0902 - Audit

The attached associates and interim checks also reinforce this evidence.

2.15 Drafting of documents and contracts

The Company's commitment to integrity is reinforced by the creation, storage and provision of accurate company documents.

These documents are valuable assets and must be managed and protected with care.

Proper document retention is a fundamental part of corporate compliance, best defined in specific company procedures.

2.15.1 Retention and destruction of documents

The law of the country in which we operate requires the Company to retain certain documents for specified periods of time.

Failure to comply with local and international regulations may result in penalties or serious disadvantages in any legal proceedings.

Everyone must remember that the preservation of Company documentation is the responsibility of the Company.

The Company must be able to retain and justify all documents, test reports and business consulting activities. Recipients are required to comply with the Company's document retention and destruction policies, as well as the relevant laws applicable in the countries in which the Company operates.

Our company policy is not to destroy or alter our documents in response to or in anticipation of any legal proceedings, inquiry or investigation.

Recipients are not permitted to alter, destroy or conceal a document for the purpose of invalidate its use in official proceedings.

3 Criteria for Conduct in Relations with Employees

3.1 Human Resources

The Company recognises the central importance of human resources and the importance of establishing and maintaining

relationships based on loyalty and mutual trust.

Human resources refer to management, employees, collaborators, including occasional ones, agents and brokers.

The management of employment and collaboration relationships is inspired by respect for the rights of workers and the full appreciation of their contribution with a view to promoting their professional development and growth.

All employees and collaborators of the Company are required to commit to acting loyally in order to comply with the obligations assumed in the employment contract and the provisions of this Code of Ethics, ensuring the performance of their duties and compliance with the commitments made to the Company, and to avoid situations and decisions that may involve real or apparent conflicts of interest with the Company.

The procedures of the integrated management system, with particular reference to

- P0702 - Training Awareness Competence
- P0707 - Onboarding

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

3.2 Staff Selection

The assessment of personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles to the company's needs, in compliance with equal opportunities for all interested parties.

The information requested is strictly related to the verification of the requirements of the professional profile, while respecting the candidate's privacy and opinions.

Those responsible for selection, whether internal to the company or external service providers, shall, within the limits of the information available, take appropriate measures to avoid favouritism, nepotism, or forms of clientelism in the selection and recruitment phases (for example, by ensuring that the recruiter is not related to the candidate).

The procedures of the integrated management system, with particular reference to

- P0702 - Training Awareness Competence
- P0707 - Onboarding

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

3.3 Employment Relationship

Staff are hired with regular employment contracts in accordance with the National Collective Labour Agreement and applicable laws. No form of irregular employment is tolerated.

Upon commencement of employment, each employee receives detailed information regarding:

- The characteristics of the role and the duties to be performed;
- Regulatory elements and minimum wage levels, as regulated by the national collective labour agreement;
- Rules and procedures to be adopted in order to avoid possible health risks associated with the work.

This information is presented to the employee so that acceptance of the position is based on a clear understanding.

The procedures of the integrated management system, with particular reference to

- P0701 - Communication Participation Consultation
- P0702 - Training Awareness Competence
- P0707 - Onboarding

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

3.4 Personnel Management

The Company avoids any form of discrimination against its employees. In the context of personnel management and development processes, as well as during the selection phase, decisions are based on the correspondence between expected profiles and those possessed by employees (e.g. in the case of promotion or transfer to another position) and/or on merit considerations (e.g. allocation of incentives based on results achieved).

Access to roles and positions is also determined on the basis of skills and abilities; furthermore, in line with overall work efficiency, flexibility in the organisation of work that facilitates the management of maternity and childcare in general is encouraged.

The assessment of employees is carried out in a broad manner, involving managers and, as far as possible, those who have interacted with the person being assessed.

Within the limits of available information and privacy protection, forms of nepotism are prohibited in personnel management activities (for example, excluding hierarchical relationships between employees who are related).

Managers make full use of and value all the professional skills present in the organisation, using every means available to promote the development and growth of their employees. In this context, it is particularly important for managers to communicate the strengths and weaknesses of their employees so that they can strive to improve their skills, including through targeted training. Training is assigned to groups or individual employees based on specific professional development needs.

All managers are required to make the most of their employees' working time by requesting performance consistent with the exercise of their duties.

It constitutes abuse of authority to request personal favours or services from subordinates that are unrelated to the company's business or any behaviour that constitutes a violation of this Code of Ethics.

The involvement of employees in the performance of their work is ensured, including through opportunities to participate in discussions and decisions that are functional to the achievement of company objectives.

Listening to various points of view, in line with company requirements, allows the manager to make final decisions; however, employees must always contribute to the implementation of the activities established.

The company is committed to ensuring that all staff are guaranteed protection of their dignity and mental and physical integrity, in accordance with the principles of equal opportunities and privacy protection, with special regard for disadvantaged and disabled persons. In this regard, it participates in the 'Nobilita' project in collaboration with the IN.RETE Consortium of Social Cooperatives.

The procedures of the integrated management system, with particular reference to

- P0701 - Communication Participation Consultation
- P0702 - Training Awareness Competence

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

3.5 Use of Company Assets

The Company's goods and services are used exclusively for legitimate business purposes of IDRA S.r.l., not for personal benefit, and never for unethical or illegal purposes. We must always seek to protect and preserve the Company's assets from theft, loss, damage, neglect, waste and misuse. Personal use of the Company's IT resources (email, internet, telephones, etc.) must not interfere with work productivity and must not constitute a cost to the Company.

3.6 Health and Safety

Employee safety is a top priority.

All Company employees have the right to a healthy and safe workplace.

The Company's workplace health and safety policy is inspired by a culture of respect and is based on a strategy of maximum attention to the safety of all people who work there. It is implemented on a daily basis through design aimed at minimising environmental impact and maximising safety during the production, construction, management and maintenance of facilities, and in general in the performance of company activities.

The Company is committed to spreading and consolidating a culture of safety, developing risk awareness and promoting responsible behaviour on the part of all employees. It also works to preserve, above all through preventive actions, the health and safety of workers, as well as the interests of other stakeholders.

The Company's objective is to protect its human, capital and financial resources, constantly seeking the necessary synergies not only within the Company, but also with suppliers, businesses and customers involved in its activities.

Collaborators and employees are responsible for adopting precautions and protective equipment in order to avoid harm to persons, ensuring a safe workplace in compliance with local regulations on health and safety in the workplace.

Suppliers and subcontractors are required to comply with the provisions contained in the regulations in health and safety in the workplace.

Any act or threat of violence in the workplace by or against an employee or collaborator is prohibited.

It is prohibited to bring weapons or other potentially dangerous objects or substances into the workplace or work facilities, except as provided for by law. IDRA Srl prohibits employees and collaborators from threatening or participating in acts of violence against colleagues or other persons in the course of their activities with the Company.

Maintaining certification of integrated management systems in accordance with the following standards:

- UNI EN ISO 9001: 2015
- UNI EN ISO 14001: 2015
- UNI ISO 45001: 2018

demonstrate the organisation's ongoing commitment in this area.

The procedures of the integrated management system, with particular reference to

- P0706 – Maintenance
- P0800 – Operational control
- P0808 – Emergencies
- P0812 – Procurement
- P0813 – Health Surveillance
- P0814 – High-Risk Categories
- P0815 - Hazardous Substances
- P0816 - PPE

As well as the associated annexes and interim checks, these constitute reinforcing elements of such evidence.

3.7 Narcotics and alcohol

IDRA S.r.l. is committed to ensuring a healthy and drug-free workplace.

The possession or use of any substance (other than prescribed medication) that may create a hazardous condition

of danger is strictly prohibited in the workplace.

Illegal drugs are strictly prohibited in our facilities or at sponsored events.

The consumption of alcohol is always prohibited for all employees and collaborators who use company vehicles or any other company equipment/vehicle/means of transport that requires complete abstinence from alcohol for safe use.

3.8 Privacy and personal data protection

IDRA S.r.l. recognises the importance of confidentiality as a fundamental right.

Maintaining the confidentiality of the personal information of employees, former employees, candidates, study participants and others is essential to us.

We are committed to implementing increasingly effective systems to promote compliance with the privacy laws applicable to our business in order to ensure that personal information is collected, processed, stored and transferred using appropriate precautions and that access is restricted to those individuals who have a legitimate reason to know or access such information.

Consequently, the privacy rights of employees, as well as customers, suppliers, and others with whom we work, must be respected.

Anyone with access to personal information must agree to comply with applicable personal data protection regulations and collect, use, and disclose personal information only in accordance with local regulations and laws.

Any investigation into the ideas, preferences, personal tastes and, in general, the private lives of employees is prohibited.

The company undertakes to protect personal data acquired, stored and processed in the course of its management activities, in full compliance with the relevant legal provisions and in accordance with the directives issued by specifically designated company representatives.

All appropriate measures are taken to avoid the risks of unauthorised access or processing that is not permitted or does not comply with the purposes for which the data was collected and subsequently identified. In particular, employees who are not expressly authorised and trained in accordance with their duties, in the forms and terms set out in Article 29 of EU Regulation [No. 2016/679 \(known as the GDPR\)](#), are prohibited from knowing, recording, processing and disclosing the personal data of other employees or third parties.

The processing of personal data must always be carried out in accordance with the provisions of EU Regulation No. 2016/679 (GDPR) and Legislative Decree No. 196/2003 and subsequent amendments and additions.

The procedures of the integrated management system, with particular reference to

- P0705 - IT Hardware and Software Systems
- P0707 - Onboarding

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

3.9 Integrity, protection and equal opportunities

The Company promotes respect for the physical, cultural and moral integrity of its employees and employees. It guarantees working conditions that respect individual dignity.

For this reason, it protects workers from acts of psychological violence and combats any attitude or behaviour that is discriminatory or harmful to the individual (e.g. insults, threats, isolation or excessive intrusiveness, professional limitations).

Sexual harassment is not permitted, and behaviour or speech that may upset a person's sensibilities must be avoided (e.g. displaying images with explicit sexual references, disseminating such images using company IT systems, or making persistent and continuous allusions).

Any employee of the Company who believes they have been harassed or discriminated against on grounds of age, gender, sexuality, race, health, nationality, political opinions, religious beliefs, etc., may report the incident to their manager, who will assess whether there has been a breach of the Code of Ethics.

However, disparities are not considered discrimination if they are justified or justifiable on the basis of objective criteria. Finally, the Company supports and respects human rights in accordance with the UN Universal Declaration of Human Rights.

The procedures of the integrated management system, with particular reference to

- P0707 - Onboarding

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

3.10 Prevention of Discrimination and Harassment

The company is committed to maintaining a workplace free from discrimination and/or harassment. The shared goal is to prohibit discrimination/harassment in the workplace, committed by or against managers, colleagues, customers, suppliers or visitors. The Company cares that all employees work and grow in a healthy and respectful manner in a productive environment.

It is the responsibility of all management to:

- Promote a harassment-free workplace and set an example of appropriate behaviour in the workplace;
- Be directly accountable for the conduct of their staff and the smooth running of their department;
- Addressing harassment situations immediately after becoming aware of them;
- Take appropriate measures during a harassment investigation, including separating the parties;
- Ensuring that harassment situations are handled sensitively and confidentially.

Employees are responsible for:

- Treating others with respect in the workplace
- Reporting any harassment to their line manager or human resources manager
- Cooperating with any investigation into harassment and respecting the confidentiality of the investigation process

The company will promptly:

- Dealing with allegations of harassment in a timely, confidential and effective manner
- Respecting employees' rights during investigations and protecting them from retaliation;
- Train employees to promote a harassment-free workplace.

3.11 Prevention of Conflicts of Interest

The Company's management and employees are required to avoid situations in which conflicts of interest may arise and to refrain from taking personal advantage of business opportunities that come to their attention in the course of their duties.

By way of example and without limitation, the following situations may give rise to a conflict of interest:

- The obvious or hidden involvement of the interested party in the activities of suppliers, customers or competitors;
- The exploitation of one's position to pursue interests that conflict with those of the company;
- The use of information acquired in the course of work for personal gain or for the benefit of third parties and in any case contrary to the interests of the company;
- Holding a senior position (sole director, department head) and having economic interests with suppliers, customers, or competitors (interests in companies, ownership of securities, professional appointments, etc.), including through family members;
- Performing unauthorised work of any kind (manual labour, intellectual services) for customers, suppliers, competitors and/or third parties in conflict with the company's interests.

In the event of even the appearance of a conflict of interest, the person concerned is required to notify their manager, who, in accordance with the established procedures, will inform their own manager, who will assess the actual existence of the conflict on a case-by-case basis.

3.12 Employee Responsibilities

Employees must behave in a manner inspired by loyalty and fairness, in compliance with the obligations assumed in their employment contract and in accordance with this Code, as well as being legally and professionally correct, ensuring the required performance, and are required to report any violation of the rules of conduct established by internal procedures through the appropriate channels.

All employees must be familiar with and implement the company's information security policies to ensure the integrity and confidentiality of information.

They are required to draft their documents using clear, objective and comprehensive language, allowing for any checks by colleagues, managers or external parties authorised to request them.

All employees are required to work diligently to protect company assets through responsible behaviour in line with the operating procedures established to regulate their use, accurately documenting their use.

In particular, every employee must use the assets entrusted to them with care and parsimony and avoid improper use of company assets that could cause damage or reduce efficiency, or in any case be contrary to the interests of the company.

Each employee is responsible for protecting the resources entrusted to them.

The Company reserves the right to prevent misuse of its assets and infrastructure through the use of accounting systems, financial control reporting and risk analysis and prevention, without prejudice to compliance with applicable laws (privacy law, labour regulations).

With regard to IT applications, all employees are required to strictly comply with company security policies in order not to compromise the functionality and protection of IT systems (such as, for example, the prohibition on installing unauthorised programmes and software on company hardware or tampering with company-owned applications, forcing company programmes, or other operations that do not comply with company-authorised procedures).

3.13 Whistleblowing

The term whistleblowing refers to reporting as an expression of civic duty, which helps to bring to light and prevent situations that undermine good administration or the public interest.

IDRA S.r.l. aims to maintain an environment where open and honest communication is the rule rather than the exception, with the desire that all employees and collaborators feel comfortable asking questions or expressing concerns when they believe that possible violations have occurred. The Company guarantees its employees and stakeholders the opportunity and necessary protections to report any illegal activity or irregularity committed by the organisation itself or by its members.

In compliance with Legislative Decree No. 24 of 10 March 2023, which transposes EU Directive 2019/1937, the Organisation allows its staff to anonymously report any violation *"of national or European Union regulations that harm the public interest or the integrity of the public administration or private entity, which they have become aware of in a public or private work context"* (Article 1, paragraph 1 of Legislative Decree 24/2023).

IDRA S.r.l. guarantees the confidentiality and anonymity of anyone who wishes to make a report and of the information provided in accordance with the law.

To this end, the company has set up a confidential communication channel to ensure compliance with the characteristics of *Internal Reporting* as required by the Decree.

The communication line set up at <https://idragroup.com/it/whistleblowing> is, in fact, an internal communication channel within the organisation that ensures:

- the confidentiality of the identity of the person making the report,
- the confidentiality of the identity of the person involved and the person mentioned in the report,
- the confidentiality of the identity of the person reporting the incident, the content of the report and any supporting documentation.

The IdraGroup Whistleblowing portal has been designed in accordance with the principles of privacy and security by design and by default, i.e. by integrating the requirements of the GDPR into the software development and by default, right from the design stage.

Traffic to the IdraGroup Whistleblowing portal is encrypted in transit, while data stored on the platform is encrypted at rest (in storage or in the database).

The company also guarantees its stakeholders the following:

- **confidentiality obligation** (Art. 12): reports cannot be used beyond what is necessary to follow up on them, and the identity of the reporting person cannot be directly or indirectly revealed without their consent;
- **processing of personal data** (Art. 13): all processing, including communication between the competent authorities, must be carried out in accordance with Regulation (EU) 2016/679, Legislative Decree No. 196 of 30 June 2003, and Legislative Decree No. 51 of 18 May 2018;
- **retention of documentation on reports** (Art. 14): it must always be retained for the time necessary to process the report, and in any case no longer than 5 years from the communication of the final outcome of the reporting procedure.

In order to protect reports, the company has provided a series of operational guidelines to ensure maximum IT security and protect the anonymity/confidentiality of the report:

- use private devices that you control to make reports or to consult reports you have already made;
- If possible, use an incognito browser window.
- keep your credentials in secure locations where there is no risk of sharing them with anyone;
- Ensure that you do not make reports or access the IdraGroup Whistleblowing portal in public or in places where your screen activity can be seen by other individuals.
- access the IdraGroup Whistleblowing portal only through a secure internet connection and a private network so as to protect your internet traffic before it reaches the platform.

4 Criteria of Conduct in Customer Relations

4.1 Sales Contracts

The Company's contracts and communications with customers (including any advertising messages) are based on completeness, transparency and professionalism. Furthermore, contracts comply with current regulations and are comprehensive, so that no element relevant to the customer's decision is overlooked.

The procedures of the integrated management system, with particular reference to

- P0701 - Communication Participation Consultation
- P0802 - Commercial

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

4.2 Style of Conduct with Customers and Customer Satisfaction

The Company's behaviour towards its customers is based on helpfulness, respect and courtesy, with a view to establishing a collaborative and highly professional relationship.

In line with the principles of impartiality and equal opportunity, the Company undertakes not to discriminate arbitrarily against its customers.

The Company also undertakes not to use misleading or untruthful promotional tools and to adhere to the truth in advertising, commercial or any other type of communication.

The Company undertakes to respond to suggestions and complaints from customers using appropriate and timely communication systems (e.g. telephone services, e-mail addresses, etc.).

The scope of application may develop and evolve in line with market developments, the expectations and interests of stakeholders and business risks, as identified and evident in S040001 - Context Analysis, Internal Parties, Risks, with annual updates.

The procedures of the integrated management system, with particular reference to

- P0701 - Communication Participation Consultation
- P0802 - Commercial

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

4.3 Quality of Products and Services

The Company undertakes to provide products and services that meet reasonable customer expectations and comply with safety principles, and to guarantee adequate quality standards for the services and products offered on the basis of predefined levels.

The scope of application may develop and evolve in line with market developments, the expectations and interests of stakeholders and business risks, as identified and evident in S040001 - Context Analysis, Internal Parties, Risks, with annual updates.

Maintenance of integrated management system certification according to the following standards:

- UNI EN ISO 9001: 2015
- UNI EN ISO 14001: 2015
- UNI ISO 45001: 2018

These standards demonstrate the organisation's ongoing commitment in this field.

4.4 Insurance

The Company undertakes to protect its assets and human resources by taking out appropriate civil liability insurance policies with leading insurance companies in order to guarantee compensation for any damage suffered by them in the course of the Company's activities or as a result of unforeseeable events.

In this regard, the management of relations with these insurance companies is based on maximum transparency and fairness, with the Company undertaking to promptly transmit any information concerning the occurrence of claims, both in terms of communicating all the elements necessary for risk assessment and in relation to determining the damages to be compensated.

The Company keeps and periodically updates a summary sheet of all existing insurance contracts for consultation by internal and external control bodies.

5 Criteria of Conduct in Relations with Suppliers

5.1 Compliance with Laws

The Company expressly requires that suppliers with whom it has contractual relationships to act in compliance with human rights, workers' rights and the environment.

In particular, by way of example, the Company requires that suppliers refrain from using child or underage labour and from discrimination, abuse or coercion to the detriment of workers, and that they comply with environmental regulations.

The procedures of the integrated management system, with particular reference to

- P0801 - Supplier Selection, Evaluation and Qualification - Procurement
- P0812 - Procurement

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

5.2 Supplier Selection

Relationships with suppliers are governed by this Code of Ethics and by internal purchasing procedures.

Purchasing processes are based on seeking the maximum competitive advantage for the Company and granting equal opportunities to all suppliers. They are also based on mutual loyalty, transparency and collaboration.

In particular, the Company's employees involved in these processes are required to:

- Not preclude any supplier who meets the requirements from competing for contracts, adopting objective and documentable criteria when selecting candidates;
- Ensure sufficient competition in each tender, for example by considering, where possible, at least three companies, professionals or entities in the selection of the supplier; failure to comply with this procedure must be adequately justified and is permitted for purchases with a total value of less than €5,000.

The selection of suppliers and the determination of purchasing conditions are based on an objective assessment of quality, price and the ability to provide and guarantee adequate services, including after-sales service and product warranty. Specifically, employees, collaborators, agents, brokers or any other person acting in the name and on behalf of the Company may not:

- Receive any form of remuneration from anyone for the performance of an act within the scope of their duties or contrary to their official duties;
- Accept any form of influence from third parties outside the Company, and from the Company without authorisation, for the purpose of making decisions relating to the choice of supplier.

The procedures of the integrated management system, with particular reference to

- P0801 - Supplier Selection, Evaluation and Qualification - Procurement
- P0812 - Procurement

The attached associates and interim checks also reinforce this evidence.

5.3 Protection of ethical aspects in supply

Should the Company become aware that a supplier, in carrying out its activities for the Company, has adopted conduct that is not in line with the general principles of this Code of Ethics, it is entitled to take appropriate measures, up to and including the exclusion of any further opportunities for collaboration.

To ensure maximum transparency and efficiency in the purchasing process, the Company shall arrange for:

- The separation of roles between the unit requesting the supply and the unit entering into the contract;
- Adequate traceability of the choices made through the storage of information and official tender and contract documents for the periods established by current regulations.

The conclusion of a contract with a supplier must always be based on extremely clear relationships, avoiding forms of dependency where possible.

Thus, by way of example and without limitation, long-term binding projects with short-term contracts that require continuous renewal with price revisions, or consultancy contracts without adequate transfer of know-how, or exclusive contracts that preclude the possibility of assigning tasks to other more qualified professionals, should be avoided.

When assigning tasks to consultants, it is mandatory to verify their high professional competence in relation to the content of the service requested, as well as their compliance with legal requirements and possession of the necessary qualifications for its execution.

When assigning tasks or requesting quotes, the supplier must always sign a confidentiality agreement, i.e. a commitment not to use company information and data except for the purpose of providing the service or commercial offer.

The remuneration of consultants, agents or representatives and partners must be agreed and determined in writing only.

No payments or remuneration of any kind may be made in cash or in kind.

The procedures of the integrated management system, with particular reference to

- P0801 - Selection, Evaluation, Qualification of Suppliers - Procurement
- P0812 - Procurement
- P0817 - Access

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

5.4 Prohibition on the sale of counterfeit goods

The Italian regulatory framework for combating counterfeiting is particularly advanced.

The Company is committed to strict compliance with the requirements associated, in particular, with:

- Legislative Decree 30/2005, as amended by Legislative Decree No. 131/2010 (the so-called Industrial Property Code)
- Law No. 99/2009 (Provisions for the development and internationalisation of businesses, as well as energy)
- EU legislation, in particular:
 - Council Regulation (EC) No. 207/2009 on the Community trade mark,
 - Regulation (EU) No 608/2013 of the European Parliament and of the Council concerning customs enforcement of intellectual property rights;
 - Directive 2004/48 EC, implemented by Legislative Decree No. 140 of 2006, on the enforcement of intellectual property rights.

In particular, since the interest protected by the law is the economic order with regard to fair and ethical trade, the Organisation ensures the honesty of commercial exchanges against the danger of fraud in the circulation of products by adopting active policies aimed at preventing the introduction of goods with false markings on the market.

The policy defined by the Organisation's Top Management:

- Focuses on preventing the purchase, acceptance and distribution of fraudulent/counterfeit parts through the definition and constant updating of the fraudulent/counterfeit parts control plan, which documents the processes used for risk mitigation, elimination and reporting.
- It guarantees at least 1 year's warranty for each part sold/installed.
- It thoroughly evaluates suppliers with careful consideration of supply risks, tracking the supply chain in particular, where possible.
- Tests products upon receipt, both for minimum requirements and for optional areas determined by the customer.
- Under no circumstances should any product found to be counterfeit be returned to the supplier, and the authorities must be informed.

5.5 Contracts and other legal documents

Valid and enforceable legal documentation enables the Company to achieve its business objectives and protects it from serious business, legal and ethical risks. Without adequate legal documentation, it is difficult to enforce a commercial agreement in the event of a dispute or controversy; it may even be impossible to correctly determine turnover in accordance with accounting standards, or to hold a third party liable to IDRA S.r.l.

Financial resources must be managed in strict compliance with the powers delegated, as well as any specific authorisations for the performance of particular transactions. It is essential, for the accuracy of financial reporting, that the Company's books and records accurately and honestly reflect all transactions. The results of the Company's operations must be recorded in accordance with legal requirements and generally accepted accounting principles. All entries must be supported by appropriate documentation. Examples of Company documents include financial statements, travel and expense reports, purchase and sales documentation, and internal management reports. It is prohibited to falsify or omit any transactions that may result in an improperly recorded asset, liability, income or expense.

It is not permitted to arrange for funds to be paid or received at a location other than from the actual tax jurisdiction.

The Company has adopted specific written internal procedures to provide for and regulate the proper execution of administrative and accounting activities.

It is mandatory to document the services provided to the Company by intermediaries such as consultants, advisers, agents, specialists or distributors. Payments to such third parties must be carefully indicated so as to correspond to the services provided, and must be properly recorded in the Company's accounting records.

6 Criteria of Conduct in Relations with Shareholders and Banks

6.1 Corporate Governance

The Company works to ensure that shareholders participate in decisions within their competence in an informed manner, promotes equal and complete information, and protects their interests.

The corporate governance system adopted by the Company complies with the provisions of the law and is mainly aimed at:

- Respond to the legitimate expectations of all stakeholders, with particular attention to minority shareholders;
- Control risks;
- Ensure the regularity of management operations;
- Informing the company's stakeholders with the utmost transparency;
- Avoid any type of operation that could prejudice creditors and other stakeholders.

The scope of application may develop and evolve in line with market developments, the expectations and interests of stakeholders and business risks, as identified and evident in S040001 - Context Analysis, Internal Parties, Risks, with annual updates.

Maintaining the certification of integrated management systems according to the standards:

- UNI EN ISO 9001: 2015
- UNI EN ISO 14001: 2015
- UNI ISO 45001: 2018

demonstrate the organisation's ongoing commitment in this field.

The procedures of the integrated management system, with particular reference to

- P0701 - Communication Participation Consultation

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

6.2 Management

Management is responsible for strategic and organisational functions and for verifying the existence of the controls necessary to monitor management performance.

The company's management is required to:

- Play an active role in their duties, thus allowing the Company to benefit from their expertise;
- Participate in meetings on an ongoing basis;
- Report any situation in which they have an interest on their own behalf or on behalf of third parties that involves them, refraining from participating in decision-making processes in such situations;
- Keep confidential any documents and information acquired in the course of their duties;
- Always put the interests of the Company above the interests of any individual party.

The Management is composed of members whose number and authority ensure that their judgement can have a significant weight in the Board's decision-making process.

Management contributes its specific expertise to board discussions, so as to encourage examination of the topics under discussion from different perspectives and the consequent adoption of well-considered, informed decisions that are in line with the Company's interests.

6.3 Sole Director

The Sole Director:

- Contributes to the formulation of corporate strategies in collaboration with the General Manager.
- Supervises the activities of the General Manager and executives;
- Has the power to hire and dismiss executives.
- Verifies the implementation of its guidelines and resolutions;
- Approves the company's financial statements
- Chairs the Shareholders' Meeting and has the powers of legal representation of the Company.

6.4 The Board of Statutory Auditors

The procedure for appointing the Board of Statutory Auditors with two alternate members is based on maximum transparency.

In particular, the lists of candidates are filed at the company's registered office (accompanied by comprehensive information regarding their personal and professional characteristics and the positions they hold) and are disclosed to the entire management at least 10 days before the date scheduled for the meeting.

6.5 The Independent Auditors

In order to ensure the complete independence of judgement of the company appointed to audit the financial statements, any consulting assignments to be entrusted to the same auditing firm must be authorised, on a case-by-case basis, by the Company's management, which verifies the absence of conflicts of interest.

6.6 Financial Communication

The Company pursues its mission while ensuring full transparency in the choices it makes. In addition, the Company provides all the information necessary for shareholders to make informed decisions.

All of the Company's financial communications are characterised not only by mere compliance with regulatory requirements, but also by comprehensible language, completeness and timeliness.

6.7 Enhancement of Ownership Investment

The Company strives to ensure that its economic and financial performance safeguards and increases the value of the business, in order to adequately remunerate the risk that shareholders assume when investing their capital.

7 Criteria of Conduct Towards the Environment

IDRA S.r.l. recognises environmental protection as a fundamental value and undertakes to conduct all its activities in full compliance with current environmental legislation and contributes constructively to ecological sustainability in all its activities, taking into account the rights of the people living in the surrounding area and future generations.

The Company's strategies and operational management are based on the principles of sustainable development, with continuous attention to ensuring that activities are carried out with respect for the environment and public health, in accordance with relevant national and international directives.

The environment is a primary asset that the Company is committed to safeguarding; to this end, it plans its activities by seeking a balance between economic initiatives and essential environmental requirements. The Company is therefore committed to improving the environmental and landscape impact of its activities, as well as preventing risks to populations and the environment, not only in compliance with current legislation, but also taking into account the development of scientific research and best practices in this field on a voluntary basis.

For this reason, the company has adopted an Environmental Management System that complies with the requirements of ISO 14001:2015, demonstrating its systematic focus on the environmental impact of its operations.

Environmental protection is considered an essential priority: the principles of sustainable development and pollution prevention are integrated into all company decisions. Employees, collaborators, suppliers and partners are required to strictly comply with environmental laws and IDRA's internal policies, actively contributing to the continuous improvement of the Company's environmental performance.

The company is aware that the environment can represent a competitive advantage in an increasingly broad and demanding market in terms of quality and behaviour.

The Company's strategy is based on investments and activities that comply with the principles of sustainable development; in particular:

- Allocate a significant portion of investments to the responsible use of energy sources energy, and, in line with its production and development needs, from renewable sources;
 - Promote actions and behaviours that minimise the environmental impact of its activities and that consider the environment to be a strategic variable.

The Company promotes the following environmental policy tools:

- Voluntary agreements with institutions and trade associations;
- Environmental awareness and training activities for employees, aimed at disseminating initiatives internally and increasing the skills and professionalism of employees;
- Programmes for the rational use of energy.

IDRA S.r.l. is committed to ensuring the sustainable development of its activities in accordance with environmental regulations and laws, with a view to minimising environmental impact.

Internal operating systems are in place and must always be observed and improved in order to identify, label and manage chemical and hazardous materials that may pose a danger to the environment, and to ensure their safe management, handling, storage, recycling or reuse, and disposal.

The procedures of the integrated management system, with particular reference to

- P0706 – Maintenance
- P0808 - Emergencies
- P0809 - Monitoring and Evaluation of Environmental Aspects
- P0810 - Waste
- P0811 – Emissions

As well as the associated annexes and intermediate controls, these constitute a reinforcing element of such evidence.

The environmental conduct criteria that IDRA adopts and promotes as an integral part of this Code of Ethics are detailed below.

7.1 Reduction of Energy Consumption in the Factory

IDRA S.r.l. is committed to reducing the energy impact of its production activities through efficient energy use and optimisation of internal processes. Advanced low-consumption technologies and monitoring systems are used to constantly control and reduce the factory's energy requirements.

The company actively pursues energy savings by avoiding energy waste in every department and introducing innovative solutions to maximise efficiency. In addition, IDRA favours the use of renewable sources and high-efficiency energy systems to power its production processes, thus reducing its dependence on fossil fuels and contributing to the reduction of greenhouse gas emissions.

These measures not only ensure compliance with energy consumption regulations, but also represent a competitive advantage and a concrete example of the company's commitment to environmental sustainability.

7.2 Low Energy Consumption Solutions for Products

Product innovation within the Company is guided by the principle of environmental sustainability: the Company continuously invests in research and development to design machinery and die-casting solutions with reduced energy consumption.

Each new product is designed with the aim of ensuring high performance with minimum energy consumption, thereby reducing its environmental impact throughout its entire life cycle. The *Life Cycle Thinking* approach is adopted during the design phase, integrating Life Cycle Assessment (LCA) to identify opportunities for reducing the environmental impact of products from the earliest stages.

The Company promotes the use of sustainable materials and high-efficiency components, ensuring that its solutions are energy-saving without compromising reliability or quality. Thanks to these low-consumption solutions, customers can in turn optimise their environmental performance, in line with the company's philosophy of promoting best sustainability practices in the sector.

7.3 Monitoring and Reduction of Water Consumption

Aware of the scarcity of water resources, the Company pays close attention to monitoring and systematically reducing water consumption in its plants.

Control programmes are implemented to regularly measure water supply and water use in production processes, with the aim of identifying areas for improvement and reducing waste.

The company invests in technologies and measures to improve water efficiency, such as closed cooling circuits and recirculation systems, reducing the need to draw new water from outside sources. In compliance with ISO 14001 regulations and principles, IDRA sets annual targets for water consumption reduction and raises staff awareness of responsible water use.

The protection of surface and groundwater resources is an integral part of the company's commitments, which are also pursued by preventing accidental spills of hazardous substances that could contaminate the water. Through these measures, the Company contributes to the protection of the water ecosystem and the conservation of a vital resource for the community.

7.4 Water Reuse and Wastewater Management

The Company actively promotes water reuse in its processes and responsible wastewater management, in line with the highest environmental standards.

Where technically possible, the water used in production cycles is recovered, treated and returned to the process, reducing the volume of discharges and the consumption of new water.

The company has equipped itself with wastewater treatment systems that ensure compliance with legal parameters before discharge into the environment, minimising the impact on surrounding aquatic ecosystems. Measures are studied and implemented to use treated wastewater for secondary purposes (e.g. for non-critical industrial uses or for irrigating indoor greenery), so as to make the most of every water resource used.

The Company operates according to the principle that every drop of water saved or reused contributes to protecting the environment: for this reason, it works constantly to increase water recovery and minimise discharges.

These circular water economy practices reflect the company's commitment to minimising its water footprint and protecting biodiversity linked to aquatic environments.

7.5 Reduction of Greenhouse Gas Emissions

The Company recognises that climate change is one of the most significant challenges of our time and is committed to progressively reducing its greenhouse gas (GHG) emissions. Through constant monitoring of its carbon footprint and the adoption of low-impact technologies, the Company works to limit direct emissions from production processes and indirect emissions linked to energy use and value chain activities.

The company invests in high-efficiency plants, favours the use of renewable energy and promotes operating practices that reduce fossil fuel consumption, thus contributing to international climate change mitigation goals.

The Company sets measurable targets for reducing CO₂ and other greenhouse gas emissions and communicates its progress to stakeholders through transparent tools such as environmental reports.

This approach confirms the company's desire to position itself as a responsible industrial player, capable of combining economic growth with a concrete contribution to ecological transition.

7.6 Control and Reduction of Atmospheric Emissions

Air quality is a key issue for the Company, which takes a proactive approach to monitoring and reducing atmospheric emissions from its activities.

The company has implemented measures to control gaseous emissions (e.g. CO₂ and other greenhouse gases) and local air pollutant emissions (such as dust and volatile compounds), in compliance with regulatory limits and often with even more stringent standards.

Through the installation of abatement systems and the adoption of low-impact processes, the Company ensures that emissions are constantly monitored and strives to reduce them over time. Particular attention is paid to pollution prevention: the Company carries out preventive assessments of the environmental impact of new processes or plant modifications in order to avoid increases in emissions.

In addition, the Company has set measurable targets for mitigating its contribution to climate change, committing to progressively reduce the carbon footprint of its operations and products.

Thanks to constant technological and managerial improvement, the Company pursues environmental excellence also in terms of air quality, aware that cleaner air means well-being for the environment and the community.

7.7 Sustainable Management of Air Conditioning Systems

Aware of the environmental impact of air conditioning systems, the Company adopts policies aimed at reducing energy consumption and related emissions. The company has implemented a sustainable management plan for its air conditioning and cooling systems, which includes:

- the use of energy-efficient equipment,
- periodic maintenance to ensure optimal performance,
- the gradual replacement of traditional refrigerants with fluids with low global warming potential (GWP), in accordance with European regulations (F-gas Regulation).

In this way, the company reduces not only electricity consumption but also the risk of harmful substances being released into the atmosphere, damaging the environment and the climate. The commitment also extends to raising staff awareness of the correct use of air conditioners and evaluating alternative solutions, such as natural ventilation systems and renewable energy systems.

This integrated approach ensures comfort in the workplace, system safety and a lower overall environmental impact, in line with the company's philosophy of efficiency and sustainability.

7.8 Waste Reduction and Recycling Promotion

The Company adopts a waste management model based on the principles of minimisation, reuse and recycling, with the aim of reducing the impact of its waste on the environment as much as possible. Waste production is constantly monitored and analysed, identifying the production stages where it is possible to prevent or limit the generation of waste.

The company sets waste reduction targets each year and actively involves employees in achieving these goals, promoting a corporate culture focused on waste reduction.

Internal material recovery and recycling systems are implemented: for example, processing residues and secondary raw materials are reintroduced into the production cycle where feasible, in order to maximise reuse and reduce landfill disposal.

The Company also promotes separate waste collection in all workplaces and collaborates with specialised partners for the recycling of waste that cannot be reused internally. In line with its commitment to circularity, the company explores design solutions that reduce waste production upstream and supports research projects aimed at finding new uses for waste materials.

This integrated approach ensures responsible and transparent waste management, as evidenced by company policies that require recycling and recovery "where possible" as standard practice. By reducing waste and promoting recycling, the Company contributes to the conservation of natural resources and the reduction of pollution, in accordance with its environmental standards and societal expectations.

7.9 Control and Reduction of Noise Emissions

Attention is also paid to limiting noise emissions generated by the plant, in order to protect both workers and local communities.

7.10 Biodiversity Protection

The Company is committed to preventing and mitigating any negative impact on biodiversity resulting from its industrial activities and the value chain of its products.

At the local level, the company takes precautions to protect the ecosystems around its production sites, ensuring that emissions, waste and discharges do not harm the flora and fauna of the area. For example, spills of pollutants into the soil or water are strictly avoided, and emissions into the atmosphere are kept within thresholds that do not alter the external environmental balance.

The company also integrates biodiversity considerations into its design and procurement decisions: it favours suppliers who adopt sustainable practices and raw materials from responsible sources, in order to reduce the impact on natural habitats throughout the entire product life cycle.

Internal awareness of these issues is ongoing: the Company promotes a culture in which every employee is aware of the value of biodiversity and the importance of environmentally responsible behaviour.

This set of actions ensures that industrial growth takes place while respecting the balance of ecosystems and biological wealth, confirming the company as a responsible player in relation to the environment in the broadest sense, both in terms of manufacturing and products.

7.11 End-of-Life Product Management

The Company recognises its responsibility even beyond the sales phase, actively engaging in the sustainable end-of-life management of the products it manufactures.

In the design phase, the principles of Extended Producer Responsibility (EPR) are followed: this means that every machine or system is designed taking into account its disassembly, recyclability and impact once its operating cycle is complete.

The company constantly optimises the technological and energy characteristics of its products in order to extend their useful life and facilitate maintenance, upgrades or reconditioning, thereby postponing their end of life and reducing the need for disposal.

The company promotes circularity by organising and supporting programmes for the collection and repurchase of disused equipment, encouraging customers to return goods at the end of their useful life so that they can be properly recycled or reused.

In collaboration with specialised partners, the company ensures that materials recovered from end-of-life products (metals, electronic components, oils, etc.) are recycled or disposed of in accordance with best environmental practices, minimising the amount of waste sent to landfill.

In this way, the Company confirms its proactive role in reducing the overall environmental impact of the sector, extending sustainability criteria to the final stage of its products' life cycle and helping to create a more sustainable industrial future for generations to come.

8 Criteria of Conduct Towards Other Parties

8.1 Community

IDRA is aware of the effects, including indirect ones, of its activities on economic and social development and on the general well-being of the community, as well as the importance of social acceptance by the communities in which it operates.

For this reason, it intends to conduct all its activities with respect for local and national communities and to support initiatives of cultural and social value, also with a view to improving its reputation and social acceptance.

The scope of application may develop and evolve in line with market developments, the expectations and interests of stakeholders and business risks, as identified and evident in S040001 - Context Analysis, Internal Parties, Risks, with annual updates.

8.2 Public Administration, Institutions and Authorities

Relations between IDRA and the Public Administration must be managed in a unified manner, i.e. in such a way that persons representing IDRA must receive a specific mandate either through the system of delegations and sub-delegations within the scope of the powers conferred or by virtue of specific written assignments.

Commitments made to the Public Administration, Institutions and Authorities (e.g. the Electricity and Gas Authority, the Antitrust Authority, the Data Protection Authority, etc.) is reserved exclusively for the designated and authorised company functions, in strict compliance with the applicable laws and regulations, and must not in any way compromise the integrity and reputation of the Company.

For this reason, it is necessary to collect and store documentation relating to contacts with the Public Administration.

Relations with the regulatory bodies of the free energy market are based on transparency and constructive collaboration. In accordance with this principle, the Company does not deny, conceal, manipulate or delay any information requested by the Authorities and other regulatory bodies in their inspection functions, and actively collaborates during the investigation procedures.

Employees or representatives of the Company must not promise or offer public officials, employees of the Public Administration or other Public Institutions, money, goods or other benefits of various kinds in order to promote and favour their own interests or those of the Company, or even to compensate or repay them for an act of their office or to obtain the performance of an act contrary to the duties of their office.

During business negotiations, requests or commercial relations with the Public Administration, employment and/or commercial opportunities that may benefit employees of the Public Administration on a personal basis must not be examined or proposed, nor must confidential information that could compromise the integrity or reputation of either party be solicited or obtained.

Acts of commercial courtesy, such as gifts or hospitality, or any other form of benefit, are permitted only if they are of modest value and such that they do not compromise the integrity and reputation of the parties and cannot be interpreted by an impartial third party as acts intended to obtain advantages and favours in an improper manner. In any case, such acts must always be authorised and adequately documented.

Any activity, whether direct or through an intermediary, aimed at influencing the independence of judgement or to secure any advantage for the Company.

Any employee who directly or indirectly receives offers of benefits from public officials, employees of the Public Administration or other Public Institutions in general, must immediately report this to the Supervisory Body, if an employee, or to their company representative, if a third party.

In cases where the Company must enter into voluntary agreements with local authorities for compensation and/or within the scope of agreements, it undertakes to determine the amounts to be paid based on the principle of fairness.

The scope of application may develop and evolve in line with market developments, the expectations and interests of the parties involved and the risks to the company, as identified and evident in S040001 - Context Analysis, Internal Parties, Risks, which is updated annually.

8.3 Political parties, trade unions and associations

It is forbidden to make contributions to political parties, committees, public organisations or political candidates. The Company refrains from any direct or indirect pressure on politicians (e.g. through the granting of Company facilities, acceptance of recommendations for recruitment, consultancy contracts, etc.).

8.4 Contributions and Sponsorships

Sponsorship activities, which may relate to social, environmental, sporting, entertainment and artistic issues, are intended only for events that offer a guarantee of quality, whether local, national or international, increase the prestige and visibility of the company among actual and potential customers, or involve a significant number of citizens, particularly those for which the Company can collaborate in the planning, in order to ensure their originality and effectiveness.

In any case, when choosing which proposals to accept, the Company pays particular attention to any possible conflicts of interest of a personal or corporate nature.

The Company favourably considers and, where appropriate, supports social and cultural initiatives, including through contributions to foundations whose activities are aimed at promoting personal development and improving quality of life.

Any type of contribution must be made in strict compliance with the law and applicable regulations () and must be adequately documented.

8.5 Gifts, Complimentary Items, Benefits

No form of gift is permitted that could even be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at obtaining favourable treatment in the conduct of any activity connected with the Company.

In particular, any form of gift to Italian and foreign public officials, auditors, directors of the Company and its subsidiaries, statutory auditors or their family members that could influence their independence of judgement or induce them to secure any advantage is prohibited.

It should be noted that a gift is defined as any type of benefit (free participation in conferences, promise of a job offer, etc.). Gifts offered – except those of modest value – must be adequately documented to allow for verification and authorised by the department manager, who shall notify the Supervisory Body.

This rule, which does not allow for exceptions even in countries where offering valuable gifts to business partners is customary, applies to both promised or offered gifts and those received.

Company employees who receive gifts or benefits not covered by the permitted cases are also required, in accordance with established procedures, to report them to the Supervisory Body, which assesses their appropriateness and informs the applicant of the Company's policy on the matter.

9 Communication and Training

The Code of Ethics is brought to the attention of internal and external stakeholders through specific communication activities (e.g., delivery of a copy of the Code of Ethics to all employees, dedicated sections on the website and company server, inclusion of a note informing of the adoption of the Code of Ethics in all contracts, etc.).

In order to ensure that all Company employees fully understand the Code of Ethics, and in accordance with the recommendations of the Supervisory Body, a training programme will be developed to promote awareness of the principles and rules.

The procedures of the integrated management system, with particular reference to

- P0701 - Communication Participation Consultation
- P0707 - Onboarding
- P0817 - Access

As well as the associated annexes and intermediate controls, constitute a reinforcing element of this evidence.

9.1 Communication Obligations

All Recipients of the Code are required to promptly report to Management any behaviour that contravenes the provisions of the Code itself, the Model, the law and internal procedures.

The Company will promptly investigate all reports and take appropriate action. Any questions or information reported will be treated with care by Management.

Please note that communications or reports must always be made in accordance with the criteria of truthfulness, clarity and completeness, and must not be made for purposes other than those provided for in the Code of Ethics.

Anyone who expresses a sincere concern will not be subject to retaliation, reduction in pay or any form of harassment.

No employee, at any level, is authorised to take retaliatory action, reduce remuneration or harass another employee for expressing a concern in good faith.

10 Violations of the Code of Ethics

Compliance with the rules of the Code of Ethics shall be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of Article 2104 of the Civil Code.

Violations of the rules of the Code of Ethics may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, in accordance with the procedures set out in Article 7 of the Workers' Statute, with all legal consequences, including with regard to the continuation of the employment relationship, and may result in compensation for damages arising therefrom.

For all other stakeholders with whom the Company has contractual relationships, violation of the rules of the Code of Ethics may constitute a breach of contractual obligations, with all legal consequences, including termination of the contract and/or assignment, and may result in compensation for damages arising therefrom.

The Company undertakes to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective violations of the Code of Ethics and in accordance with the provisions in force regarding the regulation of employment relationships.

In the event of a violation of any Company policy, or knowingly authorising a violation, the employee may be subject to disciplinary action, including dismissal and compensation to the Group for any losses resulting from their actions.

Furthermore, where applicable, a violation of one of these policies may result in legal action being taken against the employee by the Group, or in the matter being reported to the competent state authorities.

Violation of the provisions contained in this Code by any recipient (including external companies/personnel, e.g. suppliers, contractors/subcontractors, agents, associates, customers, consultants, etc.), will constitute a serious breach which, depending on its severity, may justify the termination of the contract/collaboration with the Company for breach of contract.

11 Final Provisions

This Code is a fundamental element of the Organisation and Management Model pursuant to Legislative Decree 231/01, and as such, its approval and updating process follows the provisions set out therein.

11.1 Implementation of the Code of Ethics and Controls

The Company undertakes to communicate the values and principles contained in the Code to all Recipients and to ensure its internal and external dissemination by: - distributing it to all members of the Corporate Bodies and employees; - displaying it in an accessible place; - making it available to third-party recipients and any other interested parties upon request by emailinginfo@chimicgarda.it. All employees, directors, shareholders, auditors, consultants, all those who work for the Company, regardless of the relationship, even temporary, that binds them to it (e.g. temporary staff, interns, etc.) and the main suppliers must read the Code and undertake to follow the requirements and rules contained therein.

11.2 Attachments

- S050201 - Integrated Management System Policy
- S050203 - Company Organisation Chart

