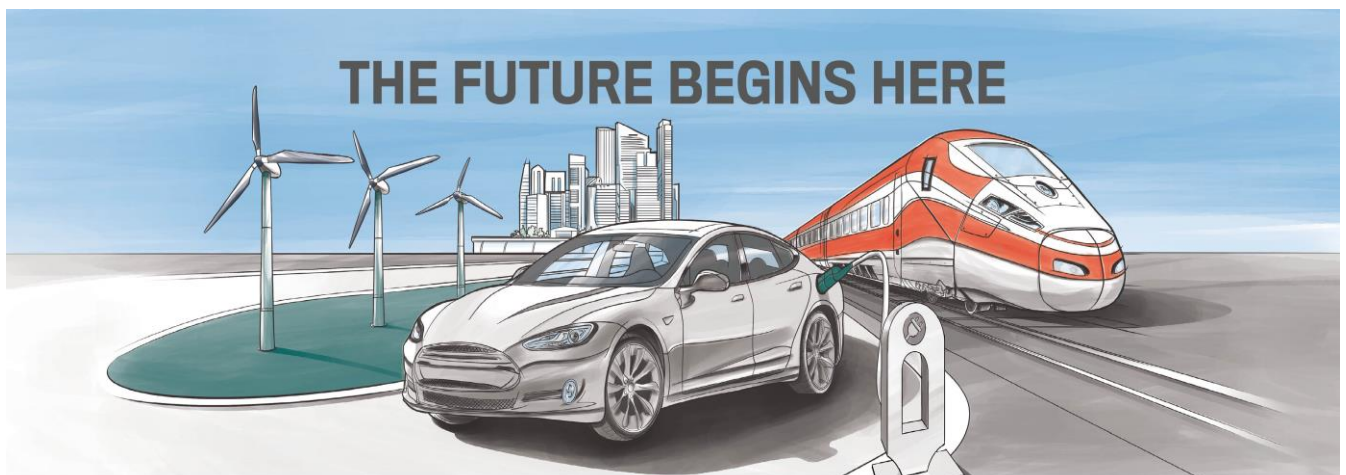


# EURO GROUP®

In motion around you.

## - CODE OF ETHICS -



LEADER IN THE PRODUCTION  
OF HIGH TECH STATORS  
AND ROTORS FOR ELECTRIC  
MOTORS AND GENERATORS.



*In over 50 years of existence, our Group has built an excellent reputation all over the world within the sector in which it operates. Technical expertise, innovation, quality, constant growth and its increasing commitment internationally have made the companies linked to Euro Group leaders in the sector of components for electric cars. This is what the Companies of the Group must continue to do in the future.*

*This **Code of Ethics** are the guidelines for our business conduct and represent the ethical and legal framework within which we intend to successfully run our business. It contains the fundamental principles and regulations of business conduct that each of the companies of the Group must draw guidance from, both internally and in relations with external counterparties and the public in general. This Code defines the rules through which we as a Company discharge our obligations and responsibility in ethical and legal terms.*

*This Code was adapted to the new legislative requirements and is based on international treaties on human rights, corruption and sustainability. Its aim is to promote awareness of the laws and moral principles as an integral part of our business conduct. The key message is that as far as Euro Group and its subsidiaries are concerned, business opportunities only exist if these are based on honesty and legality.*

*We urge all our employees to strictly adhere to and embrace these guidelines.*

*Sergio Iori  
Presidente*

*Marco Arduini  
Amministratore Delegato*

*Isidoro Guardalà  
CFO*

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# 1. GLOSSARY

The following expressions will have the meanings shown below in this Code:

“Employees”	individuals who have an employment relationship with the Company (including employed persons on a fixed term or part-time contract), trainees or apprentices, as well as temporary workers provided to the Company by third parties in compliance with the applicable laws.
“Collaborators”	individuals who have agency or sales representation agreements with the Company or other types of collaboration links that involve the supply of coordinated and continuous services, that are mainly personal in nature, albeit not based on an employment relationship, or any other type of relationship detailed in art. 409 of the Civil Procedure Code <sup>1</sup> , as well as any other person subject to the management or supervision of any individual in a management position.
“Manager”	means each individual that is responsible for one or more units or company departments, in compliance with the Company’s most recent organisational structure.
“Company Representatives”	members of the board of directors, members of the board of statutory auditors and general managers, if appointed, of the Company, during their term in office, as well as any other individual in a management position, i.e. any other person who has the task of representation, administration or management of the Company or one of its organisational units that is afforded financial and functional independence, as well as any other person who exercises, including on a de-facto basis, management and control functions for the Company.
“Government Official”	any official, director or employee of a public entity or entity subject to public control or a public international organisation, or a non governmental organisation or a body governed by public law or a public company whose employees are, in virtue of this status or for other reasons, treated like public officials or public service officers or public officers in accordance with the applicable regulations, and anyone who acts in an official capacity for and on behalf of the above mentioned entities, or is a representative or official of any political party or candidate for public office. The term “publically controlled entity” includes, by way of example but not of limitation, any entity, governed by public or private law, in which one or more public entities and/or bodies governed by public law have shareholdings and/or powers and/or interests that are sufficient for giving them control over said entity. The above definition also includes an entity that is at least 50% owned, or de-facto controlled, by any public entity and/or body governed by public law.
“Company”	Euro Group

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<sup>1</sup> Art. 409. *Individual employment disputes*. – The provisions in the present chapter are observed in disputes relating to: 1) private employment relationships, even if these do not relate to the running of a company; 2) sharecropping relations, agricultural partnerships, rent to direct producers, as well as relations deriving from other agricultural contract, without prejudice to the jurisdiction of specialist agricultural sections; 3) agency relationships, commercial representation and other relations involving the provision of coordinated and continual services, of a mainly personal nature, albeit not based on an employment relationship; 4) employment relations of employees of public bodies that exclusively or mainly carry out economic activities; 5) employment relations of employees of public bodies and other relationships governed by public law, unless these are devolved by the law to another judge.“

## **2. PREAMBLE**

### **Fundamental principles and other recipients of the Code**

The provisions of this Code apply to Euro Group and its subsidiaries' Employees, Collaborators and Company Representatives, unless established otherwise in this Code and, in any case, in accordance with the limits to which this is compatible with laws or contractual obligations (including national, local and corporate collective bargaining agreements) that are applicable in each case to their relations with the Company. In accordance with the above, any reference to Employees contained in this Code is understood to also refer to the Company's Collaborators and Company Representatives.

Where necessary, the Company promotes the application of this Code with its Employees, Collaborators and Company Representatives including through the addition of, within the respective contracts with the Company, specific clauses requiring them to observe the provisions of this Code.

The Company supervises so that the selection of candidates to the role of Employees, Collaborators and Company Representatives is also conducted in order to assess the consistency of candidates' personal and professional qualities to the provisions of this Code.

### **Effectiveness of the Code**

This Code represents the utmost expression of the Company's guiding principles.

As such any conduct that is not in compliance with the Code, even when it is the intention of the individual perpetrator to promote the interests of the Company, shall not be permitted or tolerated, and shall be considered to be activities committed against the interests of the Company.

Therefore compliance with the Code represents an integral part of the contractual obligations of the Company's Employees, including pursuant to art. 2104 of the Italian Civil Code and the breach thereof could represent a breach of contract and/or a disciplinary offence and, if applicable, could require the compensation of any damages caused to the Company by said breach, in compliance with the applicable legislation and national bargaining agreements.

## **3. CONTENT**

### **A. GENERAL PRINCIPLES OF CONDUCT**

#### **A.1 Observance of the law**

Observance of the law and regulations of the legal system of every Country in which the Company operates represents a fundamental principle for Euro Group and its subsidiaries that every Employee must observe in the performance of their professional activities. The breach of laws or internal regulations is not admissible in any circumstances.

Irrespective of the penalties established by the law, Employees that are responsible for a breach shall face disciplinary measures resulting from failure to respect their professional obligations.

#### **A.2 Respect, Honesty and integrity**

All Employees shall acknowledge and respect the personal dignity, private life and personality rights of all individuals. Moreover, all Employees work with individuals of different nationalities, cultures, religions, age, disabilities, race, and sexual identity. In line with our institutional principles and in compliance with laws on employment that are applicable in the various Countries in which the Company operates, discrimination against anyone on the basis of any of the above described characteristics shall not be tolerated, nor will sexual abuse or offences, or personal or other types of offences.

These principles apply for both working relationships within the Company and in relations with third parties. Decisions that are taken with regard to collaborators – whether they are colleagues, employees, suppliers, customers and commercial counterparties – are based exclusively on fair considerations and not on inappropriate considerations dictated by discrimination or coercion.

In carrying out their functions, Employees shall conduct themselves with transparency and honesty, accepting the responsibilities required of them on the basis of their roles. Moreover, Employees shall be reliable partners and by acting with absolute integrity, shall not make promises they are not able to keep.

Euro Group and its subsidiaries acknowledge and embrace the value of inclusion and encourage diversity by guaranteeing equal access, treatment and opportunities to everyone in its workplace. Euro Group and its subsidiaries also actively condemn any form of harassment or discrimination based on personal conditions or characteristics.

#### **A.3 Protecting the reputation of Euro Group and its subsidiaries**

The reputation of Euro Group and its subsidiaries derives significantly from the actions and conduct of each Employee. Therefore, the unlawful or inappropriate conduct of just a single Employee can, in itself, cause significant damage to the Company.

Every Employee is required, through their conduct, to protect and promote the good reputation of Euro Group and its subsidiaries.

#### **A.4 Management, responsibility and control**

A culture of integrity and Compliance stems from an organisation's top management. Every Manager is required to fulfil their obligations in terms of organisation and control. Moreover, they are responsible for their collaborators and must earn the latter's respect by adopting an exemplary conduct and demonstrating efficiency, loyalty and expertise. This also means that every Manager must highlight the importance of ethical conduct in accordance with principles of Compliance, by discussing this during all day-to-day activities and promoting the implementation of said conduct through personal leadership and training. Every Manager must set objectives that are clear, ambitious but realistic and perform their leading role through the concept of "management by example".

Managers should grant their collaborators as much responsibility and freedom of activity as possible, while highlighting the fact that respect of the rules of Compliance is required in all circumstances and at all times. Managers should also be open and make themselves available to collaborators who wish to discuss concerns they might have relating to Compliance, ask questions or discuss professional or personal issues.

The duties of the Managers do not exempt employees from their own responsibilities. Everyone must collaborate to observe the applicable laws and internal regulations. The specific responsibilities of Managers are listed here for the sole purpose of providing employees with an idea of the guidance and support they are to expect from their superiors.

It is the duty of every Manager to ensure that there is no breach of laws in the areas they are personally responsible for that could have been prevented or in any case avoided through a suitable level of control. Managers shall remain responsible for the fulfilment of duties that are delegated by them to their collaborators.

In particular each manager has a duty to:

1. conduct a thorough selection of their collaborators on the basis of their personal and professional aptitudes, including for the purposes of compliance with this Code. The importance of conducting a thorough selection increases proportionally with the importance of the tasks that the collaborator is to perform (selection duty);
2. explain to their collaborators in a precise, complete and binding manner the obligations they are to fulfil and specifically the obligation to comply with the law and this Code (duty of instruction);
3. continually supervise compliance by their collaborators with the law and this Code (duty of control);
4. communicate in a clear manner to their collaborators the importance of conduct that is honest and compliant with the principles of Compliance in the performance of their daily activities, while also informing them that breaches of the law and this Code are not permissible and could represent a breach of contract and/or a disciplinary offence on the basis of the applicable legislation and could be punished as such (duty of communication).

## **B. RELATIONS WITH COMMERCIAL COUNTERPARTIES AND THIRD PARTIES**

### **B.1 Fair competition and antitrust law**

Fair competition enables the market to evolve freely and results in advantages for society as a whole.

Every Employee is required to respect the laws relating to fair competition.

It is not always easy to assess compliance of conduct to the antitrust law, in particular because of different individual cases and the different laws that are in force in the various Countries the Company operates in. For example, in many legal systems it is common practice to apply special antitrust regulations to large companies.

There follows below some examples of conducts that could result in a breach of the antitrust regulations.

Therefore, by way of example and not of limitation, Employees must not:

- have discussions with competitors regarding prices, production capacities, sales and offer policies, profits, profit margins, costs, distribution methods or any other parameters that could determine or influence the competitive conduct of the Company with the aim of persuading competitors to align themselves with said conduct;
- draw up non-compete agreements, agreements aiming to limit negotiations with suppliers, participation to tenders or sharing of customers, markets, territories or production schedules;
- adopt actions with the aim of influencing resale prices by the Company's resellers, attempt to establish limits on the exports or imports of goods supplied by Euro Group and its subsidiaries.

Moreover, employees must not acquire information on competitors through industrial espionage, corruption, theft or electronic interceptions, or deliberately divulge false information on a competitor or its products or services.

### **B.2 Anti-corruption: offer and granting of benefits**

Euro Group and its subsidiaries compete fairly in the market to acquire orders based upon the quality, price and innovation of its products and services and does not offer undue advantages to third parties. As a result, Employees must not offer, promise, grant or authorise – directly or indirectly – the granting of sums of cash on any other benefit to influence activities or obtain an undue advantage. This same prohibition– i.e. the granting of a valuable consideration to obtain an undue advantage – also applies with regard to a private commercial counterparty that is involved in a business transaction. Any offer, promise, concession or donation must be made in conformity with the applicable laws and must not in any way create the impression of bad faith or impropriety. This means that no offer, promise, concession or donation should be made if this can reasonably be interpreted as an attempt to unduly influence or as an act of corruption towards a commercial counterparty for the granting to Euro Group and its subsidiaries of a commercial advantage.

Moreover, employees must not grant sums of cash or any other benefit in an indirect manner (e.g. to a consultant, agent, intermediary, business partner or other third parties), if the circumstances suggest that these may, entirely or in part, directly or indirectly, be used to influence an official act or to achieve an undue advantage in a commercial transaction. For the above reason, employees authorised to select consultants, agents, partners in joint ventures or other commercial counterparties must adopt suitable measures in order to:

- ensure that the third parties involved are aware of and respect the anti-corruption policies of Euro Group and its subsidiaries or equivalent provisions;
- evaluate the qualifications and reputation of said third parties;
- insert appropriate clauses in agreements and contracts to protect Euro Group and its subsidiaries.

Finally, every investment decision made by the Company– whether this involves the acquisition of a majority shareholding in a company, or a minority shareholding or a joint venture agreement – must always follow a prior control of its adherence to principles of Compliance.

### **B.3 Anti-corruption: demanding and accepting benefits**

Employees must not exploit their professional position to demand, accept, procure or obtain promises of benefits of any kind. This principle does not apply in the event of unsolicited acceptance of occasional gifts that have a purely symbolic value or lunches or forms of entertainment of modest value, in line with local customs and habits, as well as with the internal regulations of Euro Group and its subsidiaries.

Any other gift, lunch or form of entertainment that is not compliant with the above must be refused or returned.

### **B.4 Political contributions, donations and sponsorships**

As a socially responsible company Euro Group and its subsidiaries make donations in cash or in kind for training, scientific, artistic and cultural as well as social and humanitarian purposes. Sponsorships made by Euro Group and its subsidiaries on the basis of which the company receives advertising space are not considered to be donations, nor are membership fees paid to industrial associations or membership fees paid to organisations that are of interest to the business of the company. In any case, certain donations are prohibited, including donations:

1. to natural persons or for-profit organisations;
2. made on private bank accounts;
3. to organisations whose purposes are not compatible with the corporate principles of Euro Group and its subsidiaries;
4. that would damage the reputation of Euro Group and its subsidiaries.

The transparency of all donations must be guaranteed. It is therefore necessary to know the recipient of the donation and the actual use of the donation and it is always essential to report the reason for the donation and its respective use for a specific purpose. So-called “quasi donations”, i.e. considerations that are paid out for a specific service, the value of which significantly exceeds the value of the service itself (therefore the part which exceeds the value of the service can essentially be considered a donation), are not permissible, because they contravene the principle of transparency. Indeed, in said cases, the contract that was drawn up actually hides or conceals a donation (hence the term “quasi donations”) or in any case an unjustified granting of cash or other benefits.

A sponsorship is understood to be a contribution in cash or in kind by Euro Group and its subsidiaries for an event organised by third parties in exchange for the opportunity to give visibility to the brands of Euro Group and its subsidiaries through, for example, the exposure of the Euro Group logo, mentioning Euro Group in opening or closing speeches, participation of a speaker at a round table and tickets for the specific event.

All contributions paid out under the form of sponsorship must be provided in a transparent manner and governed by a written agreement. They must also be used to pursue legitimate commercial purposes and be appropriate to that which is offered in exchange by the organiser of the event. Moreover, said contributions



must not be promised, offered or paid out to ensure unfair competitive advantages for Euro Group and its subsidiaries or other undue purposes (e.g. the acquisition of new customers) and must not be used for events organised by natural persons or organisations the purposes of which are incompatible with the corporate principles of Euro Group or which would damage the reputation of Euro Group and its subsidiaries.

### **B.5 Anti-money laundering**

Money laundering involves putting back into circulation within the ordinary economic cycle “dirty money” by concealing its criminal nature and origin– links to activities such as terrorism, drug-trafficking or corruption – by making it appear lawful or preventing the identification of its real origin or the respective owners.

The objective that is pursued by Euro Group and its subsidiaries is that of conducting its business affairs exclusively with customers, consultants and commercial counterparties of proven good reputation, who are involved in lawful business activities and whose finances have a lawful origin. The Company is opposed to the facilitating of money laundering. Employees must respect the anti-money laundering laws and the procedures of Euro Group and its subsidiaries for identifying customers, forms of payment or other suspicious transactions that may involve money laundering. To avoid any problems in this regard, employees must pay careful attention and report any suspicious behaviour by customers, consultants and commercial counterparties. Moreover, employees shall strictly comply with all provisions pertaining to accounting, registration and financial reporting that are applicable to cash flows and payments connected to transactions and contracts.

### **B.6 Principles relating to commercial exchanges**

Euro Group and its subsidiaries observe all regulations relating to export control and customs laws that are applicable in the Countries in which it operates. Export controls normally apply to the transfer of goods beyond specific national borders. Laws on export control apply to direct or indirect exports or imports, to or from Countries or parties who are sanctioned or blacklisted for example, for national security purposes or as a result of their involvement in criminal activities. A breach of these laws and regulations could result in serious penalties, such as fines or revocation by the government of simplified importing and exporting procedures (interruption of the supply chain).

Employees that are involved in importing and exporting goods in the manners described above must respect the applicable economic sanctions, laws and regulations, and observe all respective policies and procedures established by the sector in which they operate.

### **B.7 Relations with suppliers**

Euro Group and its subsidiaries expect their suppliers to observe all applicable laws and to share its values and principles, while accepting all of their responsibilities towards its stakeholders and the environment. Moreover, its suppliers undertake to:

- observe all applicable laws;
- respect the prohibition of corruption;
- respect the fundamental human rights of employees;
- observe laws prohibiting child labour;
- accept responsibilities for the health and safety of employees;
- ensure the protection of the environment in compliance with the applicable regulations;
- promote with their own respective suppliers observance of the “Code of Ethics of Euro Group and its subsidiaries”.

### **B.8 Special regulations for the placing of orders**

The Company conducts a fair and impartial assessment of the offers it receives from its suppliers.

Employees shall adhere to the procedures for the selection and awarding of contracts to suppliers that are established by the Company.

In any case, in tendering, supply and procurement relations or in the supply of goods and services to the Company, Employees shall, in the performance of their professional duties, observe in particular the following regulations:

- (i) Employees must communicate to their Manager or applicable bodies appointed for said purpose by the Company any personal interest in the performance of their duties, that could cause the emergence of conflicts of interests;
- (ii) in the event of competing offers, suppliers must not be favoured or hindered in an unfair manner. As a result, Employees must not prevent prospective suppliers, who possess the specific qualification requirements established by the Company at that moment, from having the possibility to be awarded the contracts in question, and shall adopt for said purpose assessment and selection criteria that are objective and transparent;
- (iii) it is only permissible to accept invitations from counterparties if the reason and scope thereof are suitable and when a refusal would be contrary to the duty of courtesy;
- (iv) no Employee is allowed to give to parties, with whom they have professional relations, personal orders from which they could derive unfair advantages. This applies in particular when Employees can directly or indirectly influence the awarding of an assignment to a supplier by the Company or a company of the Euro Group.

## **C. CONFLICTS OF INTEREST**

### **C.1 Conflicts of interest**

In the performance of their duties, employees of Euro Group and its subsidiaries are obliged to make decisions that are in the best interest of the Company and which are not based on their own personal interest. Conflicts of interest may arise in cases where Employees carry out activities or favour their own personal interests at the expense of the interests of Euro Group and its subsidiaries.

Employees who find themselves in a situation of having any personal interest in relation to the performance of their duties must immediately inform their Managers.

Employees are expressly prohibited from using, for their own contracts or personal orders, companies with whom they have business relations in the performance of their duties for Euro Group and its subsidiaries, if they can derive a personal advantage in relation to said contracts or personal orders. This provision applies in particular when Employees exercise or are able to exercise a direct or indirect influence on Euro Group and its subsidiaries awarding a contract to the company in question.

A conflict of interest can be generated by a business relationship with a competitor or customer of Euro Group and its subsidiaries, by an interest in the business activities of the latter or by an involvement in collateral activities that compromise the ability of Employees to fulfil their responsibilities for Euro Group and its subsidiaries. It is therefore important for Employees to identify and avoid any conflicts of interest, including apparent conflicts of interest, in the performance of their professional activities.

### **C.2 Competing against Euro Group and its subsidiaries**

Employees are not permitted to conduct or carry out activities in favour of competitors of Euro Group and its subsidiaries or become involved in competing businesses.

### **C.3 Collateral activities**

Employees are not permitted to carry out collateral activities in competition with Euro Group and its subsidiaries. Employees intending to engage in paid collateral activities must inform Euro Group and its subsidiaries in writing of this in advance and obtain a written authorisation for said purpose. Occasional activities involving writing, lectures and similar sporadic commitments are not considered to be collateral activities. The above-mentioned authorisation can be denied if it could be compromising for the interests of Euro Group and its subsidiaries and if Employees have relations with the company in question during the performance of their duties for Euro Group and its subsidiaries. For the same reasons an authorisation that was previously granted may be revoked.

### **C.4 Shareholdings in other companies**

Without prejudice to the provisions of internal regulations, Employees that have or acquire direct or indirect stakes in the share capital of a competing company must report this to their managers, if said stake gives them the opportunity to exercise an influence on the running of competing companies. As a general principle, it is assumed that such an opportunity exists when a stake exceeds 5% of the entire share capital of the competing company.

Employees that have or acquire direct or indirect stakes in the share capital of a commercial counterparty of Euro Group and its subsidiaries or a company in which Euro Group has a shareholding must report this to their managers, if they have relations with said commercial counterparty or company in the performance of their professional duties or if they have a role in said company. For shareholdings in companies that are listed on the stock exchange, the above provision applies only if the shareholding exceeds 5% of the entire share capital.

After a shareholding in a third-party company is reported, Euro Group and its subsidiaries will have the right to adopt suitable measures to eliminate any potential conflict of interest.

## **D. USE OF COMPANY ASSETS**

The devices and equipment in the offices and other business premises of Euro Group and its subsidiaries, such as telephones, photocopiers, PCs, software, Internet/Intranet, machines and other utensils, including email and voicemail systems, must be used exclusively for business purposes and not for personal use. At a local level it is possible to establish exceptions and agree upon use subject to payment, on condition that the use of company assets:

- is not connected to any unlawful activity;
- does not generate an actual or potential conflict of interest;
- does not involve relevant additional costs, does not interfere with the business activity of the Company or involve other negative effects for the Company, for example by interfering with the tasks assigned to an Employee or other employees.

It is in no case permissible to collect or send information inciting racial hatred, the misrepresentation of violence or other criminal activities, or which contains material deemed offensive from a sexual perspective in relation to the respective cultural environment. No Employee is allowed, without the prior authorisation of their Manager, to create archives, databases, videos and audio recordings or reproductions, by using equipment or facilities of Euro Group and its subsidiaries, unless the purposes are directly connected to the Company's business.

## **E. MANAGEMENT OF INFORMATION**

### **E.1 Accounting entries and financial integrity**

Accurate and truthful reporting is essential for the purposes of transparent and efficient disclosure. This applies equally to both relations with investors, collaborators, customers and business partners, and institutional information to the general public and public authorities.

Moreover, the company is required to implement processes and controls that are effective and which guarantee the execution of transactions in accordance with authorisations by its management. Euro Group and its subsidiaries must also prevent and identify any unauthorised use of the Company's assets. All employees must ensure that accounting records for Euro Group and its subsidiaries that are created or requested by them or for which they are responsible:

- are complete;
- are accurate;
- accurately reflect every transaction;
- are drafted promptly and in compliance with the applicable regulations and accounting principles;
- that the transactions carried out shall be used for the purposes of economic and financial reporting both internally and externally.

The above-mentioned principles apply also to the drafting of expense claims by Employees.

### **E.2 Confidentiality**

Confidential internal information or information that is owned by Euro Group and its subsidiaries that have not been divulged to the general public must be kept confidential. Information that is not in the public domain which is obtained by or which relates to suppliers, customers, employees, agents, consultants or other third parties must also be kept reserved in compliance with legal and contractual requirements.

The expression “internal information or information that is owned by Euro Group” shall identify in particular, but shall not be limited to:

- data relating to the organisation and company assets, prices, sales, profits, markets and customers as well as other issues relating to the Company’s business;
- information on production activities or research and development;
- internal financial data.

The confidentiality obligation shall remain in force after the termination of the employment relationship and/or contractual relations, since the disclosure of confidential information, could, at any time, damage the business, customers or counterparties of Euro Group and its subsidiaries.

### **E. 3 Protection and security of personal data**

Access to the Intranet and Internet, the exchange of information at a global level through electronic and IT systems, as well as commercial negotiations that are conducted electronically, is essential for the effective performance of the working activities of every Employee and the for the overall success of the company’s business. However, the advantages provided by electronic communication systems involve risks in terms of privacy and data security. An effective prevention of these risks is an important component of the management of IT systems, the duties of the company’s management and the conduct of each Employee.

The processing of personal data is permitted only when the collection, processing and use of said data are necessary for predetermined, defined and legitimate purposes. Moreover, personal data must be stored securely and appropriate precautions must be adopted when data is sent. Moreover, the highest standards must be guaranteed in terms of the quality of the data and protection against unauthorised access. The use of personal data must take place in complete transparency towards the data subjects, who have the right to verify the use and correctness of the information and, where appropriate, challenge or block this use and order the cancellation of the data.

In some legal systems (including the European Union) stringent laws and regulations are in place on the processing of personal data, including data relating to third parties, such as customers or commercial counterparties. All employees are required to monitor applicable laws to protect the privacy of third parties.

Euro Group relies on internal procedures and contracts to manage and protect data. These documents refer to the EU’s General Data Protection Regulation (GDPR) and address each of the following categories of data:

- Personal data of candidates
- Contracts with customers
- Contracts with suppliers
- Employees’ personal data
- Data collected on the Euro Group website
- Personal data of the company visitors

Lastly, Euro Group and its subsidiaries recognize the importance of protecting the company’s sensitive information from increasingly common cyberattacks. For this reason, in order to keep business and personal information secured, Euro Group and its subsidiaries encourage all their employees to always recognize in advance and promptly communicate to an IT expert when they think data has been exposed to a cyber-risk.

## **F. PROTECTION OF THE ENVIRONMENT, HEALTH AND SAFETY IN THE WORKPLACE**

### **F.1 Environment and technical security**

The protection of the environment and the safeguarding of natural resources are some of the main corporate objectives. Through the commitment of its managers and employees, Euro Group and its subsidiaries endeavour to conduct their businesses in a manner that protects the environment and continually improves its own environmental performance. An environmental management system has been implemented by the

Company at a global level and guarantees respect of the law and defines high standards of conformity in this regard. In order to be compliant with this system, Euro Group and its subsidiaries adhere to the guidelines contained in the *Environmental, Health and Safety Policy*. Consequently, the Group and its subsidiaries have obtained a number of certifications, which are applicable to different legal entities, including:

- Quality Management System (ISO 9001:2015, IATF 16949:2016)
- Environmental Management System (ISO 14001:2015)
- Health and safety Management System (ISO 45001:2018)
- Production processes (ISO 3834-Part 2 Cert.nr. 2/IT/508)

Straight from the development phase of a product, eco-sustainable design, technical security and the safeguarding of health represent primary objectives and basic guiding principles. All Employees must contribute to the pursuit of these objectives through their own conduct.

## **F. 2 Safety in the workplace**

The safeguarding of the health and safety of its employees in the workplace represents a priority for Euro Group and its subsidiaries. It is everyone's responsibility to promote the Company's commitment for guaranteeing the utmost security in the running of its business activities. Responsibility towards employees requires the adoption of the best possible measures in the prevention of accidents, e is reflected through:

- the technical planning of workspaces, equipment and processes;
- the management of safety;
- suitable training on safety;
- individual behaviour in the workplace.

The places of work must be compliant with the requirements established by a design that is focused on health and safety. All employees must maintain the highest level of attention on protecting safety in the workplace.

## **G. REPORTING**

Employees have the right to present personal report to their Manager, HR or other bodies delegated for said purpose.

Situations that represent potential breaches of this Code must be reported to HR. All reports can be forwarded confidentially and anonymously and will be subject to in-depth investigations, with the resulting adoption of any suitable measures. All documentation shall be kept confidential, to the extent permitted by the law, and no form of reprisal shall be tolerated against individuals making reports.

## **H. IMPLEMENTATION AND MONITORING OF COMPLIANCE ACTIVITIES**

Euro Group and its subsidiaries' Management actively promotes the highest level of distribution of this Code and ensures that its provisions are constantly implemented.

Respect for the law and the observance of this Code will be controlled on an ongoing basis by all companies of Euro Group, in compliance with applicable procedures and provisions of national laws.

Moreover, the Company will implement the above provisions with the adoption of models of organisation, management and control in conformity with the Italian legislation, and specifically legislative degree 231/01 and as amended.

## **I. ADDITIONAL INFORMATION AND CONTACTS**

Integrity is at the heart of every action by Euro Group and its subsidiaries. This Code defines the meaning of the word "integrity" for the purposes of the company's business, but it cannot be considered exhaustive or clarify all doubts.

## **L. ADDENDUM**

### **Treaties and recommendations from international organisations**

Aside from the national legislation of individual countries there are numerous conventions and recommendations from international organisations that are worth highlighting. Although they relate mainly to the contracting States and not directly to companies, these documents represent important guidelines for directing the conduct of multinational companies and their employees. Euro Group and its subsidiaries monitor the provisions of the following treaties and recommendations:

- Universal Declaration of Human Rights (1948) and European Convention for the Protection of Human Rights and Fundamental Freedoms (1950);
- ILO (International Labour Organisation) Tripartite Declaration on Multinational Enterprises and Social Policy (1997) and ILO Declaration on the Fundamental Principles and Rights at Work (1998) (with particular regard to the following issues: abolition of child labour, ending of the practice of forced labour, non- discrimination, freedom of association and right to collective-bargaining);
- OECD (Organisation for Economic Cooperation and Development) Guidelines for Multinational Enterprises (2000);
- "Agenda 21" on sustainable development (Final document of the United Nations Conference on the environment and development, Rio de Janeiro 1992);
- UN Convention on combating corruption (2005).

Euro Group and its subsidiaries therefore require that their employees, suppliers and commercial counterparties all around the world acknowledge the principles of the treaties and recommendations mentioned above.