

ETHICS CODE



CAM SRL

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ETHICS CODE

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1 INTRODUCTION

The Code of Ethics has been developed to ensure that the fundamental ethical values of C.A.M. Srl are clearly defined and serve as the cornerstone of the company culture, as well as the standard of conduct for all Collaborators, in any capacity, within the Company in the performance of their activities.

2 VALIDITY AND APPLICABILITY

The Code of Ethics applies to **C.A.M. Srl** and is therefore binding on the conduct of all Collaborators and those who, in any capacity and regardless of the type of contractual relationship, contribute to the achievement of the company's goals and objectives.

For the purposes of this Code, "Collaborators" refers to the administrator, employees, individuals with collaboration contracts, and those who, by virtue of specific mandates or powers of attorney, represent the company in dealings with third parties.

The Company is committed to ensuring that the principles of this Code are observed by all individuals (clients, suppliers, professionals, and other external parties) with whom it interacts in connection with the achievement of its objectives.

The Code of Ethics is valid for all business activities carried out both in Italy and abroad, taking into account the cultural, social, and economic diversity of other countries.

C.A.M. Srl is committed to the following in relation to all parties involved in the application of this Code:

- Ensuring timely dissemination to all parties and responding to any requests for clarification.
- Ensuring periodic review and updating to adapt to changes in regulations, environmental conditions, and public sensitivity.
- Adopting an appropriate system of sanctions to address any violations.
- Establishing adequate procedures for reporting, investigating, and handling any violations.
- Ensuring confidentiality regarding the identity of those reporting violations, subject to legal obligations, and protecting their professional interests.
- Periodically verifying compliance with and adherence to the Code of Ethics.

Commitments of Collaborators to Adhere to the Code of Ethics. The Code of Ethics forms an integral part of the employment relationship. Therefore, all Collaborators are committed to:

- Acting and behaving in accordance with the provisions of the Code of Ethics.
- Reporting any violations of the Code of Ethics as soon as they become aware of them.
- Cooperating in the definition and adherence to internal procedures designed to implement the Code of Ethics.
- Consulting their supervisor or the relevant bodies regarding any sections of the Code of Ethics that require interpretation or guidance.

For the effectiveness and binding nature of the Code of Ethics, it will be published on the Company's website (<http://www.cam-carmagnola.com>); it will be available and accepted by all stakeholders of the Company.

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3 ETHICAL PRINCIPLES AND VALUES

3.1 ETHICS IN THE MANAGEMENT OF BUSINESS AND CORPORATE ACTIVITIES

3.1.1 Legality

All Collaborators are required to comply with the laws and regulations in force in the country where they operate, the Code of Ethics, and the company's internal rules, applying them with integrity and fairness. The rejection of all forms of corruption, both active and passive, is a fundamental part of this commitment.

3.1.2 Integrity

In its dealings with third parties, C.A.M. Srl is committed to acting in a correct and transparent manner. The Company is dedicated to establishing fair commercial relationships with third parties, fostering long-lasting relationships with clients and suppliers, and appropriately recognizing the contributions of its Collaborators.

3.1.3 Loyalty and transparency

Relations with external parties, relationships with its Collaborators, and those among the Collaborators themselves must be based on the highest standards of loyalty. This loyalty includes faithfulness to one's word, promises, and agreements, acting with a sense of responsibility, valuing and safeguarding the company's assets, and applying an attitude of complete good faith and transparency in every activity or decision.

3.1.4 Respect for the Dignity of individuals

C.A.M. Srl respects the fundamental rights of individuals, safeguarding their moral integrity and ensuring equal opportunities. In both internal and external relations, any behavior that is discriminatory based on political and union opinions, religion, race, nationality, age, gender, sexual orientation, health status, or any other personal characteristic is not tolerated.

3.1.5 Prohibition of smoking and the Abuse of Alcoholic Substances or Drugs

It is strictly prohibited to possess, consume, offer, or transfer alcoholic beverages and narcotic substances during working hours and at the workplace. Additionally, smoking is prohibited in the workplace. The Company gives special consideration to those who request protection from "second-hand smoke" at their workplace

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3.2 WORK ETHICS, PROTECTION, AND ENHANCEMENT OF COLLABORATORS

3.2.1 Commitment to Improvement

The Collaborators commit to the Company to apply the best of their professional skills and to continuously improve them with the tools provided by the company.

3.2.2 Confidentiality

The Collaborators commit to treating any information obtained in relation to the performance of their work activities as confidential and, therefore, to not disclose it unless strictly necessary for the performance of their duties on behalf of the company. The confidentiality obligations remain in effect even after the termination of the employment or collaboration relationship with the Company.

3.2.3 Absence of Conflict of Interest

The Collaborators ensure that every decision is made in the best interest of the Company and must therefore avoid any situation of conflict of interest between personal or family economic activities and the duties performed within the company that may compromise their independence of judgment and choice.

3.2.4 Safety, Health Protection, and Working Conditions

The Company considers that motivated and professionally excellent individuals constitute the fundamental strategic lever to compete and develop in its business. To this end, the Company promotes working conditions and environments that safeguard the psycho-physical integrity of individuals, while fostering proactivity, creativity, active participation, teamwork, and the assumption of responsibility, all in compliance with the need to balance professional and personal spheres. responsabilità,

3.2.5 Equal Opportunities

Professional development and management of the Collaborators are based on the principle of equal opportunities; the recognition of achieved results, professional potential, and the skills demonstrated by individuals constitute the essential criteria for career and salary advancements, in continuous and systematic comparison with the market, ensuring transparency regarding the evaluation method and communication procedures

3.2.6 Professional Development

The Company is committed to providing the Collaborators with adequate tools and opportunities for professional growth

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3.3 COMMITMENT TO SUSTAINABLE DEVELOPMENT AND SOCIAL RESPONSIBILITY

3.3.1 PROMOTION OF SUSTAINABLE DEVELOPMENT

The Company considers the protection of the environment to be a fundamental value for society and is convinced of the compatibility between "business development" and "environmental respect."

Therefore, the Company is committed to operating in compliance with applicable regulations, applying the best available technologies, to safeguard natural resources and preserve the environment for future generations

3.3.2 Social Responsibility

The Company operates taking into account the activities carried out by volunteer organizations and, when possible, supports non-profit associations active in the field of humanitarian aid and medical research

3.4 VALUES

3.4.1 INTEGRITY

We aim to earn the trust of all those with whom we work by keeping our promises, behaving in an ethical and transparent manner, and taking responsibility for all of our actions.

3.4.2 RESPECT

We have respect for our people, our clients, the community, and the environment in which we operate. We must contribute to improving the quality of life and the progress of society

3.4.3 TEAMWORK

For us, the best results are achieved by working as a team, collaborating with colleagues and clients.

3.4.4 SERVICE

We are fully committed to providing effective and flexible responses to the needs of our clients, building strong partnerships with them

3.4.5 EXCELLENCE

We dedicate all our energy to the constant improvement of our results and services. For us, doing well is not enough: we strive to offer the best services and products.

3.4.6 EFFICIENCY

We aim to be proactive at all times, ready to anticipate change and respond with agility and flexibility to market demands. Our people work with commitment and timeliness.

3.4.7 INNOVATION

We seek to leverage the best technologies available on the market and actively promote research within our field of applications

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4 CODE OF CONDUCT

4.1 ETHICS IN BUSINESS MANAGEMENT AND CORPORATE ACTIVITIES

The Company manages its business affairs by applying the Ethical Principles outlined in this Code and requires its Collaborators and business partners to adhere to this approach in all circumstances, regardless of the significance of the matter.

4.1.1 PREVENTION OF CORRUPTION

Our policies, from the perspective of responsible growth, aim at preventing any form of corruption, committing to develop a management system in compliance with ISO 37001:2016.

A specific commitment is made regarding the prevention of any form of corruption; in particular, each collaborator is required to:

- Clearly refuse to engage in or be subjected to any form of corrupt practice, whether directed at public officials, employees of private companies, clients, or competitors; gifts and promises of benefits of any kind or magnitude are prohibited;
- Comply with the laws applicable to the company, strictly implementing the procedures and controls defined in the management system;
- Observe the rules of fair competition and adopt transparent and traceable behaviors;
- Contribute to achieving the defined and communicated objectives in this regard;
- Support the commitment to maintain and improve the established management system.

4.1.2 INTERNAL CONTROL SYSTEM

C.A.M. Srl declares its commitment to manage and develop its activities in a sound, correct, and consistent manner with the objectives set by the Management, while constantly focusing on the continuous improvement of the quality of its products/services, environmental protection, worker safety and health, and the prevention of corruption.

C.A.M. Srl considers an adequate Internal Control System to be a fundamental element of its organizational culture, with which the Company's Collaborators are adequately informed and sensitized. The Internal Control System refers to the set of tools necessary to ensure the correct management and verification of business activities, with the aim of ensuring compliance with laws and regulations, protecting company assets, and improving the efficiency and effectiveness of all business operations.

There are various "actors" in the Internal Control System: the Board of Directors (Administrator) is responsible for designing the system, setting its guidelines, and periodically verifying its adequacy and actual functioning with the assistance of the person in charge of Internal Control.

The responsibility to ensure the correct and effective functioning of the Internal Control System lies with all of the Company's Collaborators, particularly the employees, with varying levels depending on the responsibility held by each individual.

C.A.M. Srl intends to fulfill this commitment through the application, monitoring, and development of an integrated system for the management of Quality, Safety, and Ethical Principles, in compliance with the UNI EN ISO 9001:2008, UNI ISO 37001:2016, BS-OHSAS 18001:2007, ISO3834 standards, and this Ethical Code.

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The Integrated Management System Manager, appointed by the Administrator, is responsible for verifying and evaluating the overall adequacy and effectiveness of the Integrated Management System and the Internal Control System and reports on their operations at least annually to the Administrator.

The achievement of the aforementioned objectives requires the commitment of the entire organization. Therefore, the Management, which provides all the necessary support and resources, requests the maximum cooperation and commitment from every individual at all levels within C.A.M. Srl, as well as from the individual contractors, for the faithful implementation of this Policy. This Policy considers continuous improvement of the products and services provided, environmental protection, occupational safety and health, and adherence to ethical values as key factors of competitiveness and efficiency to achieve success and maintain it over time.

4.1.3 TRANSPARENCY OF ACCOUNTING INFORMATION AND FINANCIAL COMMUNICATION

C.A.M. Srl is aware of the importance of transparency, accuracy, and completeness in accounting information and strives to maintain a reliable administrative-accounting system that accurately represents business transactions and provides the tools to identify, prevent, and manage, to the extent possible, financial and operational risks, as well as fraud detrimental to the company.

All accounting records that form the basis for the preparation of financial statements must be prepared clearly, truthfully, and correctly, and must be carefully preserved by the company departments responsible for their preparation. All Collaborators are required to ensure that business transactions are represented correctly and promptly.

4.1.4 PREVENTION OF MONEY LAUNDERING

C.A.M. Srl ensures that its economic and financial activities do not become a means to facilitate, even potentially, illegal activities and criminal or terrorist organizations.

The Company always complies with anti-money laundering regulations in any jurisdiction in which it operates.

The Company therefore proceeds with the utmost diligence to verify the information available on commercial counterparts, suppliers, partners, and consultants, in order to assess their respectability and the legitimacy of their activities before establishing business relationships with them.

4.1.5 CLIENTS RELATIONSHIP

C.A.M. Srl aims to meet the best and legitimate expectations of its Clients by providing them with quality products and services under competitive conditions, and in compliance with the applicable regulations:

- Applying internal procedures for managing relationships with Clients in order to achieve the goal of developing and maintaining favorable and lasting relationships;
- Operating in compliance with applicable laws and regulations;
- Always honoring the commitments and obligations made towards Clients;
- Adopting a behavior style towards Clients based on efficiency, high professionalism, collaboration, and courtesy;
- Ensuring truthfulness and completeness in all communications with Clients;
- Requesting that Clients adhere to the principles of this Ethical Code;
- Promptly reporting to their superior any behavior from a Client that appears to be contrary to the Ethical Principles of the Code.

To implement these commitments, the Company has established an Integrated Management System and a Policy for Quality, Safety, Environmental Protection, and Corruption Prevention, with the aim of promoting and maintaining:

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- A focus on both external and internal Clients through continuous improvement of the product/service provided
- The continuous improvement of the effectiveness and efficiency of processes
- The dissemination of a Quality culture at all organizational levels

C.A.M. Srl further commits to not abusing its creditor positions towards its Clients in order to gain an advantage or any other benefit.

In debt recovery, the Company acts according to objective and documentable criteria, applying the following principles:

- Initiating recovery procedures starting with the oldest outstanding debts,
- Providing prior information to the debtor regarding the position and the amount of the claimed debt.

To the greatest extent compatible with the company's interests, C.A.M. Srl encourages the amicable resolution of any disputes.

4.1.6 RELATIONS WITH SUPPLIERS

Suppliers play a key role in improving the overall competitiveness of the Company. Therefore, suppliers are selected based on the best characteristics in terms of quality, innovation, cost, service, continuity, and ethics.

The Company's Collaborators are required to select suppliers based on the Ethical Principles developed in this Code; they are encouraged to establish and maintain stable, transparent, and collaborative relationships with suppliers, and always act in the best interest of the company.

In particular, the Company's Collaborators, especially those involved in such processes, must:

- Adhere to internal procedures for the selection and management of supplier relationships
- Avoid discrimination between suppliers, allowing all those who meet the requirements to compete for contract awards by selecting candidates based on objective, declared, transparent, and documentable criteria
- Obtain the collaboration of suppliers in ensuring the most favorable balance between quality, cost, and delivery times
- Operate in compliance with applicable laws and regulations
- Apply the contractually agreed terms
- Maintain open and honest dialogue with suppliers, in line with good commercial practices
- Avoid situations of excessive dependence for both the Company and the supplier
- Require suppliers to adhere to the principles of this Ethical Code and, where required by procedures, include in contracts the explicit obligation to comply with it
- Promptly report to their superior any supplier behavior that may be contrary to the Ethical Principles of the Code.

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4.1.7 RELATIONS WITH OTHER EXTERNAL PARTIES

External parties that come into contact with the Company (external professionals, consultants, agents, representatives, intermediaries, etc.) are required to observe the principles contained in this Code. All Company Collaborators, in relation to their duties, must:

- Adhere to internal procedures for identifying and managing relationships with other external parties collaborating with the Company
- Carefully evaluate the opportunity to engage other external parties
- Select only counterparts with adequate professional qualifications and reputation
- Obtain assurances from external parties collaborating with the Company regarding the consistent provision of the most favorable balance between performance level, quality, cost, and delivery times
- Operate in compliance with applicable laws and regulations
- Apply the contractually agreed terms; in particular, compensation must be solely commensurate with the performance specified in the contract, and payments must not be made to any party other than the contractual counterpart or to a country other than that of the parties or where the contract is executed
- Maintain open and honest dialogue with external collaborators, in line with good commercial practices
- Require external parties collaborating with the Company to adhere to the principles of this Ethical Code and, when required by procedures, include in contracts the explicit obligation to comply with it
- Promptly report to their superior any behavior of an external party collaborating with the Company that appears to be contrary to the Ethical Principles of the Code.

4.1.8 RELATIONS WITH PUBLIC ADMINISTRATION

The Public Administration includes all government bodies.

Relations with Public Administration are reserved exclusively for the company functions that are specifically designated and/or authorized, in compliance with the following behavioral principles: comportamentali:

- No Collaborator of the Company should promise or pay sums, offer or grant goods in kind or other benefits to Public Officials personally, with the aim of promoting or favoring the Company's interests, even as a result of illicit pressure;
- No Collaborator of the Company can circumvent the aforementioned provisions by resorting to different forms of assistance or contributions that, under the guise of sponsorships, assignments, consultancy, advertising, etc., have the same prohibited objectives;
- Any Collaborator who receives instructions to act in this way must immediately report it to their superior.
- Within the limits and forms provided by law, the Company manages sponsorship processes transparently and responsibly.

4.1.9 RELATIONS WITH REPRESENTATIVES OF POLITICAL FORCES AND LOBBYING ASSOCIATIONS

In relations with representatives of political forces and representatives of interest groups, such as trade associations, unions, environmental organizations, no Collaborator should promise or offer money, provide gifts or other benefits personally, with the aim of promoting or favoring the interests of the Company, even as a result of unlawful pressure. No Collaborator of the Company may bypass these provisions by resorting to alternative forms of aid or contributions that, under the guise of sponsorships, assignments, consulting, advertising, etc., serve the same purposes prohibited above.

However, forms of strictly institutional collaboration are permitted, aimed at contributing to the realization of events or activities such as studies, research, conferences, seminars, etc.

This approach ensures transparency and compliance with ethical principles in all interactions with political representatives and interest groups, contributing to the Company's commitment to maintain its integrity in its external relations.

However, institutional collaborations aimed at supporting the organization of events or activities such as studies, research, conferences, seminars, and similar initiatives are permitted.

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4.1.10 TREATMENT OF CONFIDENTIAL INFORMATION

"Confidential Information" is an integral part of the company's assets and, as such, must be adequately protected. Confidential Information is any information related to the Company that is of a confidential nature and, if disclosed without authorization or inadvertently, could cause harm to the Company, its partners, Clients, or third parties. All employees of CAM S.r.l. must maintain the confidentiality of both internal information and information related to relationships with Clients. The confidentiality obligations continue even after the termination of the employment or collaboration relationship with the company.

4.1.11 GIFTS

It is not permissible to offer, directly or indirectly, money, gifts, or benefits of any kind personally to executives, officers, or employees of clients, suppliers, public administration entities, public institutions, or other organizations with the aim of obtaining undue advantages.

Acts of business courtesy, such as gifts or forms of hospitality, are permitted provided they are of modest value and do not compromise the integrity and reputation of either party or influence the recipient's judgment. In any case, these types of expenses must always be authorized according to the position defined in the procedures and properly documented.

Similarly, employees are not allowed to receive gifts or preferential treatment, except within the limits of normal courtesy relations and provided they are of modest value.

If an employee receives a gift beyond the aforementioned limits, they must immediately inform the Administrator, who, in collaboration with the RCPC, will ensure the immediate return or appropriate use of the received item and inform the donor of the Company's policy on this matter.

This rule, applicable to both gifts offered or promised and those received, also applies in countries where offering valuable gifts to business partners is customary.

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4.2 Ethics, Protection, and Enhancement

WORK ETHICS, PROTECTION, AND ENHANCEMENT OF COLLABORATORS. RECRUITMENT AND INTEGRATION OF PERSONNEL

Hiring responds both to the need to acquire skills and expertise that are not available within the company and to the necessity of integrating young individuals on whom to invest to ensure the company's growth and development. The search and selection of personnel to be hired is entrusted to the administrator and is carried out, respecting candidates' privacy, exclusively based on criteria of objectivity and transparency, ensuring equal opportunities and avoiding any favoritism.

All personnel are hired with a regular employment contract in compliance with applicable legislation in the hiring location; no form of irregular or "black" work is tolerated.

At the time of hiring and during the first phase of company integration, each employee receives thorough information, particularly regarding the rules that govern their employment relationship, safety and health regulations in the workplace, company policies, and the rules of the Code of Ethics, in order to ensure immediate and accelerated knowledge and facilitate a quicker integration into the company's life and culture..

4.2.1 CONFLICT OF INTEREST

Each Collaborator is required to avoid any situation where personal interests, or those of close family members, could interfere or even appear to interfere with their ability to make impartial decisions in the performance of their duties for the company.

Conflicts of interest may arise, for example, from personal relationships with suppliers, customers, or competitors, or from the possibility of deriving personal benefits from business relationships with the company.

In the event that such situations arise, the Collaborator must promptly inform their superior and, if necessary, remove themselves from the decision-making process in relation to the affected parties.

The company encourages transparency and ethical behavior, ensuring that any potential conflicts of interest are managed and resolved in a manner that preserves the integrity of both the individual and the organization.

By way of example, and not limited to, the following situations may constitute conflicts of interest:

- Having economic and financial interests (such as significant ownership of shares, professional appointments, etc.), even through family members, with suppliers, customers, or competitors.
- Engaging in work activities, even by family members, for customers, suppliers, or competitors.
- Accepting money, gifts, or favors of any kind from individuals, companies, or entities that are or intend to engage in business relations with the Company.
- Using one's position in the company or information acquired through work in a way that may create a conflict between personal interests and those of the company.

4.2.2 ENVIRONMENT AND SAFETY

The Company operates under the belief that all of its employees and other third parties accessing the workplace should be able to work in comfortable and safe environments. Furthermore, the environment is seen as a resource that must be protected for the benefit of all, future generations, and the company itself. Therefore, the Company manages its activities by striving for excellence in environmental protection, health, and safety, with the aim of continuously improving its performance in these areas.

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To this end, the Company:

- Commits to complying with the applicable laws and regulations concerning health, safety, and the environment.
- Develops and communicates guidelines for implementing environmental protection and health and safety, which must be followed.
- Promotes the participation of employees and worker representatives in the process of risk prevention, environmental protection, and safeguarding health and safety for themselves, colleagues, and third parties.
- Encourages environmental initiatives aimed at promoting sustainable development.

To implement the principles stated in its environmental and safety policy, the Company:

- Adopts certified safety and quality management systems and develops procedures and tools to manage environmental aspects related to ongoing project activities.
- Conducts and updates risk assessments to plan all health and safety protection measures for employees and third parties accessing its workplaces, ensuring their well-being.
- Ensures continuous training and awareness for its managers and all staff on environmental and safety topics.
- Engages pre-qualified suppliers for quality, safety, and environmental aspects, promotes cooperation and coordination to eliminate risks from interference, and raises awareness about environmental issues and workplace health and safety.
- Communicates with authorities and communities and collaborates with institutions to build a relationship of integrity and transparency.
- Adopts the best available technologies to eliminate risks at the source and reduce environmental impacts.
- Utilizes incident analysis tools to identify root causes and prevent recurrence.
- Plans and implements an internal audit program to verify the effectiveness and efficiency of environmental and safety management systems.

4.2.3 CORRECT USE OF COMPANY ASSETS

Each employee is responsible for the protection of the company assets entrusted to them and has the duty to document their use accurately and inform the appropriate structures promptly of any risks or damaging events for the Company.

In particular, the employee must:

- Use the available resources in accordance with their intended purpose, taking care of their proper functioning and routine maintenance to protect company assets.
- Use the resources provided by the company for work-related purposes, not personal ones.
- Avoid improper use of company assets that may cause damage to the Company or third parties, reduce efficiency, or be contrary to the company's interests.

Even inadvertent use of these assets for purposes outside of the business activities may cause significant harm to the Company (economic, reputational, competitiveness, etc.), with the aggravating factor that improper use can lead to potential criminal and administrative penalties for any illegal actions and necessitate disciplinary measures for employees. Therefore, resources must:

- Avoid waste of materials, utilities, and consumables.
- Assume responsibility for their role and adhere to the directives given by supervisors promptly, loyally, and faithfully.
- Pay particular attention to the management of C.A.M. Srl's financial resources in their possession. When submitting an expense report, only actual and authorized expenses will be reimbursed, in accordance with the rules outlined in the relevant procedures. Receipts should always be requested, and personal expenses should always be separated from business-related ones.

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4.2.4 INTERNAL COMUNICATION

The Company considers internal communication an essential structural element for the effective functioning of business processes, as it promotes the sharing of values, strategies, and goals by the employees, as well as the exchange of information and experiences.

Internal communication is implemented through the use of different tools, tailored to objectives, recipients, and content. Internal communication is also a primary and direct responsibility of each manager, within the framework of proper and continuous management of interpersonal relationships with their employees. It is realized through moments of information exchange, listening, and dialogue within individual and group relationships.

4.2.5 PERSONAL DATA SAFETY

A "personal data" is any information relating to a physical or legal person, entity, or association, identified or identifiable, even indirectly, by reference to any other information.

In order to ensure the protection of personal data, the Company, through its employees, commits to processing such data in accordance with the relevant regulations, and specifically according to the following criteria:

- Transparency towards the data subjects: they have the right to know which personal information is collected, for what reasons, and whether the data is being disclosed.
- Legality and fairness of processing.
- Relevance of the processing with the declared and pursued purposes, meaning that personal data will not be used for secondary purposes without the consent of the data subject (unless required by law).
- Disclosure of data to third parties cannot be done without the consent of the data subject (unless required by law).
- Guarantee of quality and accuracy of data.
- Right of the data subject to view and request corrections, if necessary.

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4.3 Ethics of Communication and External Relations - Relations with Public Institutions

The Company maintains constant relations with local, regional, national, and international institutions in order to represent its position on topics of interest, assess the implications of legislative and administrative activities for its operations, and respond to specific requests. Contacts with public institution officials are limited to the relevant functions or to those who have received explicit authorization from the Company's leadership.

Such contacts must take place in a spirit of loyalty, transparency, and constructive collaboration with public institutions, aiming to promote and protect the company's interests. The Company represents and promotes its interests in a transparent, rigorous, and consistent manner, avoiding any collusive behavior.

4.3.1 RELATIONS WITH REPRESENTATIVES OF POLITICAL PARTIES

The Company maintains relations with representatives of political parties solely to deepen its understanding of topics of interest and to transparently promote its positions.

4.3.2 RELATIONS WITH INTEREST GROUPS

The Company maintains relations with interest groups (e.g., Confindustria) in order to develop its activities, establish mutually beneficial forms of cooperation, and present its positions on topics of common interest.

The presentation of specific positions of the Company within associations must occur with the consent of the management or the relevant functions.

4.3.3 RELATIONS WITH MEDIA

All contacts with the media must be conducted exclusively by the designated functions, in a coordinated and consistent manner with the principles and policies of the Company.

C.A.M. Srl's communication with the outside is based on respect for the right to information, and it is strictly prohibited to disclose false or biased news or comments.

Every communication activity complies with laws, rules, and professional conduct practices and is carried out with clarity, transparency, and timeliness, safeguarding industrial secrets.

4.3.4 SPONSORSHIPS AND CONTRIBUTIONS

The Company may provide contributions and sponsorships to support initiatives proposed by public and private entities, as well as non-profit associations, duly established in accordance with the law, that promote the Company's Ethical Principles.

Sponsorships and contributions may involve events and initiatives of a social, political, cultural, sports, or artistic nature, as well as support for humanitarian projects or assistance. They may also be aimed at conducting studies, research, conferences, and seminars on topics of interest to the Company.

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5 IMPLEMENTATION NORMS – DISCIPLINARY CODE

The individual designated by C.A.M. Srl, to whom the Administrator delegates the responsibility of managing all aspects related to the dissemination and implementation of the Ethical Code, is the Compliance and Anti-Corruption Officer (RCPC).

In this regard, the RCPC, with the assistance of their staff, performs the following tasks:

- Ensure the dissemination of the Ethical Code and the principles contained therein by providing a paper copy of the Code to all Employees.
- Define operational procedures for reporting violations and handling them. These procedures, while ensuring adequate confidentiality protection, must also regulate the matter in a way that guarantees the overall fairness of the process, in order to avoid trivial, unsupported, or entirely baseless reports.
- Receive, analyze, and verify reports of violations of the Ethical Code, communicating the necessary operational methods (fax, email, etc.), and ensuring confidentiality for whistleblowers of potential violations.
- Make decisions on significant violations.
- Ensure effective communication, training, and engagement processes by coordinating initiatives to disseminate and promote understanding of the Ethical Code.
- Act as the reference point for the interpretation of relevant aspects.
- Ensure the updating of the Ethical Code.
- Utilize internal company structures to conduct appropriate periodic checks on the application of the Ethical Code.

The RCPC of C.A.M. Srl is authorized to directly collect any reports of violations of the Ethical Code concerning all affiliated companies, partners, and, generally, Business Partners.

5.1 TRAINING AND COMMUNICATION

The RCPC is responsible for developing and implementing appropriate internal communication and training plans to promote the dissemination and understanding of the Ethical Code.

Similar communication plans are also created to make the contents of the Ethical Code known to external parties and to inform relevant stakeholders about the procedures for reporting any violations.

When an employee becomes aware of situations that may represent or potentially represent a violation of the Ethical Code, they must promptly report such incidents to the RCPC of C.A.M. Srl, and if necessary, to the Sole Administrator.

5.2 VALUE OF THE ETHICAL CODE – DISCIPLINARY CODE

The adherence to the principles and rules of the Ethical Code, their consistent dissemination, and operational implementation within the scope of the assigned responsibilities is an essential and integral part of the contractual obligations of each Addressee:

- Adherence to the provisions of the Ethical Code is therefore an essential part of the contractual obligations of employees.
- The obligation to comply with this Code is included in collaboration contracts.
- In contracts with Business Partners (subsidiaries, clients, suppliers of goods and services, including those in outsourcing, contractors, professionals, consultants, credit and insurance institutions), it is a defining element of "good faith."

The Business Partner is committed to complying with the anti-corruption regulations, which also constitutes a condition for maintaining existing contractual relationships. In fact, non-compliance with these regulations would result in sanctions of various degrees, up to and including the termination of the existing contractual relationships.

The violation of the provisions of the Ethical Code by employees (employees and collaborators) constitutes a breach of contractual obligations and may result, depending on the case, in:

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- The application of sanctions and disciplinary measures as provided by the applicable Collective Bargaining Agreements.
- Termination of the relationship.
- Application of penalties.
- Compensation for damages.

No one should ever assume they can ignore the rules of the Ethical Code, believing that it is in the best interest of the Company. Furthermore, no one inside or outside the Company has the authority to issue orders or directives that violate this Code. Any non-compliance with this Code, and any request for violation of it, from anyone, must be reported, even anonymously, to the Compliance and Anti-Corruption Officer.

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