

“ETHICAL CODE”

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1. INTRODUCTION

Ilmap S.r.l. manufactures thermoplastic and stainless steel filter nozzles for water treatment. In 2019, the company set itself the goal of adopting a Quality Management System based on the UNI EN ISO 9001:2015 standard, implemented to ensure the effective and efficient use of resources while focusing on customer and other stakeholder needs. Reaching the certification standard UNI EN ISO 9001:2015 is essential, as it represents a strategic factor in competitiveness and market qualification, as well as demonstrating the efforts made by Ilmap S.r.l. in pursuing continuous customer satisfaction.

2 ETHICAL CODE GOALS

ILMAP S.r.l. adopts this Ethical Code primarily as a chart of moral rights and duties, with a view to social responsibility. This Ethical Code must be followed, without exception, by all members of the Company (management, employees, consultants, partners, suppliers) in both internal and external relationships.

This Ethical Code should be considered primarily a tool for preserving the value and integrity of the company over time. It is a set of positive principles and codes of conduct that our Company has voluntarily chosen to adopt and go public as a concrete expression of its intentions towards its stakeholders.

The Ethical Code not only describes what Company members can and cannot do, but also aims to identify useful resources for addressing specific situations in the workplace.

Thorough knowledge of the Ethical Code is therefore a duty, as is its application.

The company's reputation and success are the result of the combined efforts of each and every one of us.

The Company, understood as a social and productive context, requires rules of conduct that enable, through internal procedures and relationships with external stakeholders, compliance with the principles of transparency, fairness in relationships, and respect for individuality, in order to achieve the corporate mission.

The Ethical Code defines the rules and behaviors aimed at safeguarding the Company's image, reliability, and optimal management organization, in order to achieve its institutional goals.

3 SCOPE OF APPLICATION

The provisions of the Ethical Code apply to all employees, without exception, to anyone who directly or indirectly enters into relationships with our Company, whether permanent or temporary, to directors, collaborators, consultants, agents, attorneys, and anyone acting in the name and on behalf of our Organization.

Each employee, regardless of position or status, is responsible for their actions in compliance with this Ethical Code, company policies, and applicable national and international regulations.

This Code is brought to the attention of each member of the Board of Directors, as well as all those named therein and who, in general, have relationships with our Company.

The Ethical Code is subject to amendments and additions based on changes external and/or internal to the Organization.

4 RECIPIENTS OF THE CODE

The provisions in this Ethical Code constitute the guiding principles governing the business activities of the Company, its Directors, all individuals linked to the Company by employment relationships, and all those who cooperate in pursuing the Company's goals, within the context of their various relationships with the Company (hereinafter jointly referred to as the "Recipients").

Generally, in our relationships with stakeholders, we undertake to:

- establish stable channels of communication without any form of discrimination;
- represent interests and positions in a transparent, rigorous, and consistent way, avoiding collusive behavior;
- act in compliance with the principles defined in this Code.

The following are considered Recipients of this Ethical Code:

- members of the statutory;
- employees;
- collaborators;
- consultants;
- partners;
- suppliers;
- business counterparties.

We are committed to disseminating this Code so that all recipients comply with its contents and implement all tools necessary to facilitate its full implementation.

The members of the Board of Directors are required to be guided by the principles of this Ethical Code, as subsequently identified, when setting the company's objectives, proposing investments and implementing projects, as well as in any decision or action relating to the management of the Company.

Likewise, the managers of ILMAP S.r.l., implementing the Company's management activities, must be guided by the same principles, both within the Company, thus strengthening cohesion and the spirit of mutual collaboration, and towards third parties who come into contact with.

The principles contained in the Ethical Code must also govern relationships between Company employees, at any level and/or category and in any role assigned, as well as their relationships with third parties outside the Company.

Collaborators not bound by any relationship of subordination to ILMAP S.r.l. (such as, for example, consultants, suppliers, etc.) and all those who have commercial relationships with the Company, are equally required - in the context of the various relationships they have with the Company - to adapt their behavior to the provisions of the Ethical Code.

5 VALIDITY

This Ethical Code comes into force on the date approved by the Board of Directors and has an indefinite term, subject to any need for revision that may arise from the Annual Review.

Any changes and/or additions to it must be approved by the Board of Directors.

6 REFERENCE STANDARDS, DOCUMENTS, AND LAWS

- Artt. 2103, 2106, 2118, 2119 del Codice Civile;
- Art. 7 della Legge n. 300/1970 – Statuto dei lavoratori;
- Contratti Collettivi di Lavoro applicabili ai lavoratori del Settore e/o Comparto;
- Regolamento europeo in materia di protezione dei dati personali (GDPR 679/2016 e s.m.i.)
- Decreto legislativo 81/08 - Salute e Sicurezza dei lavoratori;
- Statuto e Regolamenti interni;
- Sistema di Gestione Qualità Aziendale (UNI EN ISO 9001:2015)

7 FUNDAMENTAL VALUES FOR ILMAP S.R.L.

The Code sets forth the fundamental values that must guide the conduct of all Company Employees, in order to ensure fairness in the conduct of company activities, the protection of assets, reliability, image, and reputation.

LEGALITY is the cornerstone of our Company. Compliance with the law is essential. Violation of this principle is therefore not justified under any circumstances. The conduct of Recipients of the Code must, first and foremost, comply with the laws in force in the country in which they operate, including international laws implemented by the country.

ILMAP S.r.l. operates in strict compliance with these rules; therefore, directors and employees, as well as those who interact with the Company in any capacity, are required, within their respective areas of responsibility, to be aware of and comply with the provisions codified (laws, equivalent acts, regulations) by international, state, regional, and local institutions.

All work activities of those working for ILMAP S.r.l. must be carried out with professional commitment, moral rigor, and managerial correctness, also to protect the Company's image.

All Recipients, as well as those working with the Company, are required, in carrying out their duties and in their professional lives at ILMAP S.r.l., to adhere to the following ethical and behavioral principles:

- **RESPECT:** This is a broad and deeply felt topic, as it affects the individual, both in their personal and private lives and in their professional lives, and also, more generally, the company's attitude toward the commitments made to its stakeholders.

In relationships within the company, respect primarily means protecting the physical and moral integrity of personnel and valorizing them as a key resource for competitiveness and success.

Externally, it means maintaining professional relationships with customers and suppliers, but also listening to other stakeholders as interlocutors to be considered, informed, and involved. Finally, it means operating in a way compatible with the surrounding environment, in the best interests of all.

- **DILIGENCE:** performing one's duties with assiduous care, scrupulous attention, and accuracy.

- **HONESTY:** refrain from committing illegal, illicit, or even simply malicious acts, both out of compliance with legal principles, the Code, and moral principles, and out of a deep-rooted sense of justice: Recipients must be aware of the ethical significance of their actions and must not pursue personal or corporate gain to the detriment of applicable laws and the rules set forth herein, or even simply perform actions that, according to common conscience, conflict with honesty.

- **IMPARTIALITY:** avoiding any discrimination based on age, gender, health, race, political opinions, religious beliefs, or otherwise. This applies to every aspect of the Organization's decisions, including the use of its Human Resources and access to hiring, development, promotion, training, and compensation.

That is, it is an objective and impartial way of operating and judging, without favoritism toward any of the parties involved, whether public or private, linked to the Recipient by ties of friendship or enmity, kinship, or affinity.

- **TRANSPARENCY:** performance of duties through a regime of full intelligibility of the actions by all; every action taken by Recipients and by those who maintain relationships with ILMAP S.r.l. must be fully reconstructible and easily identifiable in all its steps, so that all relationships are understandable and the respective acts justifiable.

- **CONFIDENTIALITY:** scrupulous abstention from the disclosure of any company data (be it technical, logistical, strategic, financial) or personal data, in compliance with all applicable privacy regulations; the collection and processing of data are strictly reserved to the corporate bodies designated for this purpose and must be carried out strictly according to company regulations.

All information held by the Organization, subject to legal requirements, may not be used for purposes other than institutional ones. Particular attention must be paid to the personal data and information of employees, customers, and collaborators (GDPR 679/2016 and subsequent amendments). The use of externally relevant company information may only be carried out by expressly authorized individuals.

Corporate security policies and procedures include additional requirements to safeguard information and IT systems. Employees must be aware of and comply with these requirements.

- **PROTECTION AND ENHANCEMENT OF THE INDIVIDUAL:** respect for each individual, valorization of their respective abilities, establishment of mechanisms of trust and empowerment of individuals, aimed at strengthening solidarity among Recipients and the common corporate mission.

We promote the value of respect, physical, moral, and cultural integrity of the individual, and are committed to pursuing employee satisfaction by supporting all initiatives aimed at creating a dynamic work environment, inspired by motivation and engagement. We prioritize teamwork, encouraging the acquisition of new skills capable of measuring, recognizing, and rewarding the contribution of each individual in an increasingly inclusive context.

- **FLEXIBILITY:** the ability to address problems without being influenced by either frameworks or preconceived notions, integrating available information into the search for the best solution.

- **EXPERIENCE/EXPERTISES:** representing a point of reference in terms of experience/expertise and relational methods for customers, partners, and colleagues.

- **VITALITY:** the ability to consistently and consistently ensure commitment, even in new, unusual, or challenging situations.

- **INTEGRITY AND TRANSPARENCY:** exemplifying a strong commitment to integrity, instilling honesty and ethics through consistent actions and behaviors across the company. In particular, transparency in acting, communicating, and informing is a key element of reliability towards internal and external stakeholders. It concerns corporate management, which must be clear and verifiable, and concerns the communication of company information to the outside world. Communication, in particular, in addition to always following established procedures, must be simple, understandable, timely, and truthful, and—if made public—easily accessible to all.

- **EFFECTIVENESS AND EFFICIENCY:** constantly improving service quality by adopting technological and organizational solutions aimed at combining customer satisfaction with efficient and cost-effective management.

- **PROTECTION OF COMPETITION:** compliance with all market regulations, avoiding unfair practices that distort fair commercial competition or infringe the intellectual property rights of third parties.

- **PROTECTION OF THE HEALTH AND SAFETY OF WORKERS AND INTERESTED PARTIES:** compliance with all applicable regulations regarding accident prevention and the prevention of occupational diseases, as well as scrupulous attention to hygiene and personal and workplace conditions.

- **PROTECTION OF THE ENVIRONMENT:** promotion of respect for the environment, understood as a common resource to be safeguarded for the benefit of the community and future generations with a view to sustainable development; compliance with all applicable regulations regarding the environment and pollution, as well as scrupulous attention to any conduct that, even the slightest, violates common sense of environmental education; implementation of waste sorting and recycling programs for reusable materials; reduction of all forms of pollution, be it environmental, acoustic, radioelectric, or otherwise.

• **LOYALTY:** Our Company requires all employees to behave loyally, diligently, and in compliance with the employment contract and company regulations; everyone's cooperation is essential to the smooth running of the Organization.

This means, first and foremost, pursuing the objectives set by the Organization and its direct managers with commitment, timeliness, and diligence, while adhering to procedures. It entails respect for the Code of Ethics and, for those responsible for managing people, a commitment to ensuring compliance by their employees and providing assistance in its implementation.

It also means taking responsibility for the company's interests in every work-related situation, such as the fulfillment of contractual obligations to the Organization by suppliers.

8 GENERAL CODE OF CONDUCT IN EXTERNAL RELATIONSHIPS

The Company, its corporate bodies, and its employees' relationships with external parties must be characterized by respect, courtesy, fairness, and clarity.

The Company is committed to continuously improving the effectiveness and efficiency of its business processes through the adoption of technical and organizational solutions aimed at achieving both customer satisfaction and management efficiency and cost-effectiveness, also in line with ISO 9001:2015 Certification.

The Company acts responsibly and in compliance with applicable legislation regarding the data it receives.

The company structures ensure the confidentiality of the information in their possession in accordance with applicable legislation (European Regulation GDPR 679/2016 and subsequent amendments) and implement procedures to prevent third parties from accessing it through irregular and unauthorized procedures.

Confidential information includes:

- a) strategic and economic/financial plans, accounting, commercial, management, and operational documents;
- b) projects and investments;
- c) personnel data such as absences, attendance, holidays, sick leave, and wages;
- d) corporate agreements, commercial agreements and contracts, and corporate documents of any kind;
- e) know-how relating to the production, development, and marketing of products, processes, and any patents;
- f) databases relating to suppliers, customers, recipients, as well as confidential commercial information;
- g) any judgment, assessment, decision, or choice, prior to their adoption or otherwise falling under the preceding points.

Recipients must operate in compliance with the provisions of the previous paragraph and maintain the utmost confidentiality, even outside of working hours, in order to safeguard the company's technical, financial, legal, administrative, and commercial know-how, as well as personnel information and data.

The Company undertakes not to exploit any ignorance, incompetence, dependence, or weakness of recipients and suppliers, and intends to protect the value of fair competition in the market by refraining from collusive behavior. For this reason, it conducts its investments in full compliance with market rules, aiming to enhance the Company's reputation.

Honesty is the fundamental principle for all the Company's activities, initiatives, reporting, and communications, and is an essential element of management.

8.1 Relations with suppliers

ILMAP S.r.l.'s suppliers are selected in accordance with the principles of this Code and the internal procedures of the Quality Management System.

Supplier selection is based on pre-established parameters that are monitored annually and are based on the principles of quality, cost-effectiveness, capacity, efficiency, and compliance with laws and regulations.

Relationships with suppliers must be based on absolute compliance with the law, the principles of the Code, and internal procedures and regulations.

ILMAP S.r.l. requires its suppliers to behave correctly, diligently, and in compliance with legal provisions, with particular attention to compliance with regulations and best practices regarding ethics, workplace health and safety, environmental protection, and the protection of intellectual property, industry, and commerce.

ILMAP S.r.l. is committed to maintaining the complete confidentiality of confidential information regarding its suppliers and their personal data, and ensures that such information is used only for strictly professional purposes. Suppliers are also required to ensure confidentiality with regard to information, documents, and personal data relating to ILMAP S.r.l. and its resources.

8.2 Relations with shareholders

In accordance with the principles of transparency and impartiality, ILMAP S.r.l. has implemented organizational measures to ensure proper management of shareholder relations. In accordance with these principles, the following are prohibited:

- Harming the integrity of the company's assets in any form and by any means. Specifically, except where expressly permitted by law, returning contributions in any form or releasing shareholders from their obligation to make them, distributing profits not actually earned or legally allocated to reserves, or distributing reserves that are not legally distributable, carrying out share capital reductions, mergers, or demergers in violation of creditor protection regulations;
- Performing any fictitious or fraudulent act aimed at influencing the will of members of the shareholders' meeting in order to obtain the irregular formation of a majority and/or influence a resolution;
- Spread false information, both within and outside the Company, concerning ILMAP S.r.l.

8.3 Relations with customers

Any form of customer acquisition that violates competition law and fails to comply with industry regulations and laws is prohibited.

Any agreement with competitors to set or control prices or sales policies, or to interfere with the free distribution of services, is also prohibited.

Assessing customer needs, engaging with them, and understanding their expectations allows us to offer increasing product quality and more targeted offerings. We are committed to always being ready to respond to changing market needs and to continuously improve the quality of the products and services offered to all customers.

8.4 Relations with authorities, institutions and public administrations

With reference to all transactions such as: contracts, authorizations, licenses, concessions, requests and/or management and use of funding of any kind from public sources (regional, national and/or EU), relationships with supervisory authorities or other independent authorities, social security institutions, tax collection agencies, bankruptcy, civil, criminal or administrative bodies or similar, these must be carried out by corporate bodies and by expressly delegated persons, in line with corporate strategies and in writing.

Gifts, gratuities, benefits (both direct and indirect), freebies, acts of courtesy and hospitality aimed at influencing the decisions of the Public Administration (and similar entities mentioned above) or even simply raising awareness

among its members are prohibited; customary gifts must meet the dual requirements of smallness (i.e., modest symbolic value) and equality (i.e., equal cost in the choice of gift for all public and private clients).

Any gifts made on a personal initiative or from personal or corporate funds not previously allocated for this purpose are prohibited. Only ILMAP S.r.l. has the power to decide company policy regarding gifts and allocate the related funds. This entails an essential obligation to document and transparently report all expenses incurred.

Sponsorships of events, demonstrations, meetings, and similar initiatives may only be made if they comply with the law and the principles of loyalty, fairness, transparency, and verifiability, as well as with the internal procedures adopted by the Company.

All relationships with public institutions, whether national or international, must be conducted through forms of communication established by applicable law, or aimed at assessing the implications of legislative and administrative activity for ILMAP S.r.l., responding to informal requests and inspections (questions, interpellations, etc.), or otherwise disclosing the Company's position on issues relevant to the Company. To this end, the Company undertakes to:

- a) establish, without any form of discrimination, stable channels of communication with all institutional stakeholders at the international, community, and local levels;
- b) represent the Company's interests and positions in a transparent, rigorous, and consistent manner, avoiding collusive behavior.

9 PRINCIPLES AND CODE OF CONDUCT TOWARDS EMPLOYEES AND COLLABORATORS

We guarantee equal opportunities to all employees, based on their professional skills and individual abilities, without any discrimination based on gender, age, sexual orientation, health, marital status, ethnicity, political opinions, or religious beliefs.

We trust our business both by safeguarding working conditions and protecting the physical and mental well-being of workers, respecting their moral personality and preventing them from being subjected to unlawful influence or undue hardship. Therefore, we expect employees at all levels to collaborate in maintaining a climate of mutual respect for the dignity, honor, and reputation of each individual within the company, thus intervening to prevent abusive or defamatory interpersonal behavior.

The Company is committed to ensure:

- a) the widest spread of the Ethical Code among its Recipients;
- b) the spread of knowledge, training, clarification, and awareness-raising regarding the contents of the Ethical Code;
- c) conducting periodic audits to ensure Recipients' compliance with the provisions of the Ethical Code;
- d) updating the Ethical Code for any developments and changes in management activities, organizational changes, or violations identified following such audits;
- e) applying appropriate disciplinary measures in the event of violations of the Ethical Code rules and regulations.
- f) All Recipients are required to be familiar with the provisions of the Ethical Code and are obligated to:
 - refrain from engaging in behavior that is in any way contrary to the provisions of the Ethical Code;
 - report to the Ethics Officer any behavior that, within the scope of ILMAP S.r.l.'s activities, even potentially violates the provisions of the Ethical Code;
 - collaborate with the Ethics Officer in verifying violations of the Ethical Code;
 - refrain from taking any action contrary to the provisions of the Ethical Code.

Regarding third parties with whom the Company maintains relationships, in any way or form, Recipients are required to:

- a) adequately inform them of the provisions of this Ethical Code;
- b) require compliance with the provisions of the Ethical Code carrying out activities involving such parties with the Company;
- c) report to the Ethics Officer any behavior that, within the context of the relationship between third parties and the Company, even potentially violates the provisions of the Ethical Code and take the appropriate measures in the event of a third party's failure to comply with the provisions of the Ethical Code.

9.1 Relations with employees and collaborators

In accordance with the principles of respect and protection of human rights, ILMAP S.r.l. conducts its business by maintaining relationships with its collaborators, and especially with its employees, based on loyalty, transparency, and mutual respect, without any discrimination. It is committed to offering all employees the same employment opportunities and opportunities for professional growth and career development based on merit.

The Company condemns all forms of labor exploitation.

Every employee has the right to work in an environment free from any type of discrimination based on gender, age, sexual orientation, health, marital status, ethnicity, political opinions, and religious beliefs.

Harassment is not permitted in internal and external employment relationships. Harassment is defined as:

- the creation of an intimidating, hostile, or isolating work environment for individual groups of workers;
- unjustified interference with the performance of another's work;
- hindering the individual employment prospects of others for purely personal competitive reasons.

Sexual harassment is neither permitted nor tolerated, including:

- proposals for private interpersonal relationships, conducted despite a reasonably evident dislike, which, given the specific nature of the situation, have the potential to disturb the Recipient's serenity with objective implications for their work performance;
- subordinating decisions relevant to the Recipient's working life to the acceptance of sexual favors.

9.2 Conflict of interest

Employees and collaborators must maintain autonomy and integrity in order to avoid conflicts of interest with respect to the company's activities. Any employee or collaborator who finds himself or herself in a conflict of interest, even a potential one, must promptly notify their manager.

9.3 Informations confidentiality

The employee is required to maintain the confidentiality of any information learned in the performance of his or her duties, even after termination of the employment relationship, and to ensure compliance with the requirements of current privacy laws.

9.4 Gifts and gratuities

It is absolutely forbidden to abuse one's position or power to induce or force someone to unduly promise money or other benefits to oneself or others.

9.5 Use of IT resources and communications systems

Anyone authorized to operate ILMAP S.r.l.'s information systems or to use them for their own purposes is responsible for the security of the systems used, is subject to applicable regulations and the terms of the license agreements, and is required to use them in accordance with the following usage rules:

- Passwords for accessing the systems must be treated with the appropriate level of confidentiality;
- IT and/or telematics equipment must be used exclusively for the benefit of the Company and must be secured whenever necessary;
- The use of network connections for purposes other than those related to the employment relationship is considered improper use of company assets and resources;
- Programs not strictly provided by the Company are prohibited, and their installation and use are therefore punishable;
- Damage to information, data, and computer programs used by the State or by another public entity or public utility, or unauthorized access to such information, data, and computer programs, whether or not used by the State, by another public entity, or by public utility entities, is punishable as is damage to computer or telematic systems and/or public utility systems;
- It is prohibited to install equipment designed to intercept, impede, or interrupt computer or telematic communications, as well as to distribute such equipment, devices, or programs, or to intercept, impede, or interrupt computer or telematic communications;
- Employees undertake to comply with copyright laws that protect intellectual property rights.

9.6 Respect for the workers health and safety

We are committed to creating and maintaining a work environment that protects the physical integrity and moral dignity of our employees, including through compliance with applicable legislation regarding safety and occupational risks.

All employees are required to use company property appropriately and safely to maintain a healthy and safe environment, free from health and safety hazards as much as possible.

Employees are required to comply with safety directives and to immediately report accidents, dangerous conditions or behaviors, and potentially harmful work situations to their designated safety managers. Employees are required to observe the provisions and instructions given for collective and individual protection. They are also required to use equipment, transportation, and other work equipment, as well as safety devices, appropriately, and report any anomalies or malfunctions. Employees undergo the medical examinations and health checks required by applicable legislation. Each employee is responsible for their own health and safety, as well as that of others in the workplace.

The Company's employees and collaborators, each within their own sphere of competence, are required to ensure full compliance with the law, the principles of this Code, company procedures, and any other internal provisions established to guarantee the protection of safety, health, and hygiene in the workplace.

10 PRINCIPLES AND CODE OF CONDUCT IN COMPANY MANAGEMENT

10.1 Company communications and information

It's a fundamental principle for ILMAP S.r.l. to provide its members with comprehensive information to ensure their awareness and informed needs. Consequently, the Company is committed to:

- implementing a corporate policy based on fairness and capable of ensuring significant long-term financial results based on a socially sustainable cost-benefit ratio;
- promoting awareness of the Company's corporate policies, programs, and projects;
- disseminating communications that are truthful, clear, complete, transparent, and timely, and prepared according to consistent criteria and, in any case, compliant with applicable legislation and in accordance with the rules and practices of proper professional conduct.

10.2 Relations with Media

Relations with the press, the media, and, generally with external stakeholders must be managed exclusively by those specifically delegated and in compliance with the specific procedures and instructions issued by ILMAP S.r.l. management.

All other employees, unless specifically delegated, must not provide information of any kind relating to the Company to representatives of the press or the media in general, nor engage in any contact with them aimed at disseminating company news. They must forward any requests to the dedicated department.

10.3 Protection of company assets

Each Company employee and collaborator is required to act diligently to protect company assets, through responsible behavior and in accordance with the operating procedures established to regulate their use.

Each Company employee and collaborator is also the custodian of the assets entrusted to them (personal computers, cell phones, vehicles, equipment, personal protective equipment, etc.) and is responsible for using them properly and in accordance with the company's best interests, preventing any improper use, in accordance with applicable legislation and the company code, and in line with the principles established by this Code and company procedures.

10.4 Company administration

ILMAP S.r.l. condemns any behavior aimed at altering accounting and corporate information and data communicated within and outside the Company, to relevant authorities, supervisory authorities, or the public.

The Company, through its employees, each within their respective areas of responsibility, ensures the regular, clear, and accurate maintenance of accounting records, granting the truthfulness, authenticity, correctness, and originality of the documentation and information disclosed in the performance of accounting reporting activities or in other corporate communications required by law and addressed to shareholders, the public, and supervisory bodies.

Accounting records must be based on accurate and verifiable information and must fully comply with internal accounting procedures. Therefore, the Company:

- guarantees transparent and timely information to all relevant bodies and functions, as well as proper collaboration between the aforementioned corporate bodies and functions;
- guarantees the truthfulness, authenticity, accuracy, and originality of the documentation and information provided in the performance of accounting reporting activities or in other corporate communications required by law and addressed to shareholders, the public, and supervisory bodies;

- facilitates the performance of the required controls by the external bodies and functions;
- ensures that all transactions are duly authorized and adequately documented, and that the documentation is archived in the best way that allows for accounting records at all times, the identification of the various levels of responsibility, and the accurate reconstruction and traceability of the transaction;
- ensures that the reasons for corporate and extraordinary transactions carried out by the Company are specified, also for the purpose of monitoring and preventing the possibility that any transfers of funds may be linked to illicit activities, such as, for example, support for terrorist or subversive groups or associations, from which the Company firmly refuse.

10.5 Internal controls

Within the scope of their roles and responsibilities, all employees are required to participate in the creation and implementation of an effective corporate control system to ensure that activities are carried out in compliance with the law and the rules of conduct set forth in this Code.

11. CODE OF CONDUCT WITH POLITICAL AND TRADE UNION ORGANIZATIONS

ILMAP S.r.l. undertakes not to make contributions of any kind, directly or indirectly, to political parties, movements, committees, and political and trade union organizations, nor to their representatives or candidates, either in Italy or abroad, with the exception of contributions required under specific regulations, and not to make contributions to organizations with which a conflict of interest could arise.

ILMAP S.r.l. undertakes not to sponsor conferences or events whose sole purpose is political propaganda, and to refrain from exerting any direct or indirect pressure on political figures (for example, by accepting referrals for hiring, consulting contracts, etc.).

ILMAP S.r.l. may cooperate, including financially, with certain organizations and for specific projects, based on the following criteria:

- a) purpose related to ILMAP S.r.l.'s mission;
- b) clear and documentable allocation of resources;
- c) express authorization from the Board of Directors

Any contribution must, however, always be made in strict compliance with applicable laws and regulations and adequately documented.

12. CODE OF CONDUCT WITH EMPLOYEES AND COLLABORATORS

12.1 Resources selection and hiring

The evaluation and selection of resources is conducted based on the candidates' professional profiles fully corresponding to those required by the Company and the company's needs, in compliance with applicable legislation, and in a non-discriminatory manner.

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

The Company's recruitment function, within the limits of available information, adopts appropriate measures to avoid favoritism, nepotism, or forms of cronyism during the selection and hiring processes.

12.2 Establishment of the employment relationship

ILMAP S.r.l. employees are hired under a regular employment contract; any form of employment that doesn't comply with current laws and the provisions of applicable national collective bargaining agreements is not tolerated.

Upon establishing the employment relationship, each employee must receive accurate information from the responsible department regarding:

- a) the nature of the position and tasks of employees work;
- b) regulatory and remuneration aspects, as regulated by the applicable national collective bargaining agreement;
- c) rules and procedures to be adopted to avoid potential health risks associated with work.

12.3 Resources management

ILMAP S.r.l. neither permits nor tolerates discrimination against its employees and collaborators.

Access to roles and/or assignments will be determined based on individual professional skills, experience, and abilities and aptitudes.

Flexibility in work organization that facilitates the management of maternity leave and childcare in general will be favored, consistent with overall work efficiency.

Resources management policies will be made available to all employees and/or independent collaborators through company communication channels (organizational documents, communications, etc.).

Requesting, as a duty of care from a superior, any performance, personal favor, or any other behavior that, in any way, constitutes a violation of this Ethical Code, is prohibited, as it constitutes an abuse of a position of authority.

The involvement of employees and/or independent collaborators in the performance of their work is ensured, including through opportunities for participation in discussions and decisions that are instrumental in achieving company goals. Employees and/or non-subordinate collaborators will participate in such moments with a spirit of collaboration and independent judgment.

12.4 Integrity and resources protection

ILMAP S.r.l. protects the moral integrity of its employees and/or independent contractors, guaranteeing them the right to working conditions that respect their dignity. Specifically, the Company protects workers from acts of psychological violence and opposes any attitude or behavior that is discriminatory or harmful to individuals, their beliefs, and preferences.

Sexual harassment, or behavior or speech that may offend a person's sensibilities, are not permitted or tolerated under any circumstances.

13. ENVIRONMENT AND WORK SAFETY

Our Company is committed to ensuring safe and healthy work environments and to being environmentally responsible and supportive. Our standard is to comply with all laws and regulations relating to the environment, safety, and health.

The Company is also committed to creating a safe and healthy environment for every employee. In support of this policy, each Recipient must comply with all safety rules and procedures. Each employee is required to promptly report any hazardous situations arising, as well as any deviations from the procedures implemented and distributed, to the Head of Prevention and Protection Services.

The principles and criteria on which our Occupational Safety Management System is based can be identified as follows:

- a) assessing risks;
- b) implementing prevention and protection measures;
- d) respecting ergonomic principles, particularly with regard to the design of workstations and the choice of work equipment and working methods, specifically to reduce monotonous and repetitive work and to reduce the effects of such work on health;
- e) take into account the level of technological development;
- f) replace what is dangerous with what is non-dangerous or less dangerous;
- g) plan prevention, aiming for a coherent whole that integrates technology, work organization, working conditions, social relations, and the influence of work environment factors;
- h) give priority to collective protection measures over individual protection measures;
- i) provide adequate instructions to workers.

These principles are used by the Company to take the necessary measures to protect the safety and health of its workers, including occupational risk prevention, information and training, as well as the provision of the necessary organization and resources.

Designated managers monitor compliance with preventive measures by the resources they supervise. They ensure that lapses in attention are avoided during risky activities. They take note of reports from employees to improve safety and safeguard health. Under no circumstances is compliance with safety measures subordinated to the interest in completing the work or meeting deadlines.

Employees (or equivalent workers) must follow the safety regulations that apply to them seriously and scrupulously, encouraging non-compliant colleagues to do the same and reporting any gaps or areas for improvement to their managers.

14. PRIVACY PROTECTION

ILMAP S.r.l. protects the personal data of those who work for it and of all those who come into contact with the company, avoiding any improper use of such information in compliance with privacy regulations and internal procedures.

It guarantees that personal data is processed only for specific, explicit, and legitimate purposes.

Information systems and software are configured to minimize the use of personal data and identifying data, thus excluding their processing when the purposes pursued in individual cases can be achieved using anonymous data or other methods that allow the data subject to be identified only when necessary.

Data collection and processing do not exceed what is necessary for the stated purposes.

The data disclosed to the Company are retained in such a way that the identification of the data subject is possible only for a period of time no longer than is necessary for the purposes for which they were collected or subsequently processed.

ILMAP S.r.l. guarantees the adoption of appropriate preventive security measures for data processing, whether performed with or without the aid of electronic tools.

In any case, conducting any investigation into the ideas, preferences, personal tastes, and, in general, the private lives of employees and/or independent contractors (profiling) is prohibited.

15. METHODS OF IMPLEMENTING THE ETHICAL CODE

The Ethical Code manager is responsible for verifying the application and implementation of the Ethical Code.

The Ethical Code manager is responsible for the following tasks:

- monitoring compliance with the Ethical Code;
- managing all aspects relating to the knowledge, dissemination, and implementation of the Code;
- promoting any amendments and additions to the Code;
- receiving reports of violations of the Ethical Code, ensuring the confidentiality of the sources of such reports, and conducting investigations;
- performing advisory functions regarding the adoption of disciplinary measures.

The Ethical Code manager is appointed by the Board of Directors.

In carrying out his/her duties, the Ethics Officer will be assisted by the necessary resources selected from within the ILMAP S.r.l. staff.

All employees are required to cooperate with the Ethics Officer, possibly providing information or company documentation necessary for his/her activities.

Reports of any violations of the Ethical Code by Recipients must be made in writing, on paper, or electronically, and addressed to the Ethical Code manager.

Employees and collaborators must report any violations or suspected violations to their immediate superior or to the Human Resources Manager, who must inform the Company's President.

The Ethical Code manager is required to collect all reports from Recipients, providing the information requested and reporting any violations of this Code.

Failure to cooperate constitutes a separate violation of this Code and is subject to sanctions as such.

15.1 Reports

ILMAP S.r.l. will establish communication channels through which reports regarding the Ethical Code can be submitted.

Recipients may report any violation or suspected violation of the Ethical Code at any time to the Ethical Code manager, who will promptly analyze the report, contacting, if appropriate, the sender, the person responsible for the alleged violation, and any potentially involved parties.

The Ethical Code manager will ensure that those who have made the above reports are protected from any type of retaliation or action that might even be suspected of constituting a form of discrimination, penalization, or punishment, and will ensure the confidentiality of the reporting party's identity, without prejudice to legal obligations.

The reporting procedure to the Ethical Code manager is as follows:

Send your reports to the email address: aliani@ilmap.it

15.2 Violations of the ethical code and sanctions

Compliance with the provisions of the Ethical Code is an integral and essential part of the contractual obligations of the Company's employees, its collaborators, or all parties who cooperate in pursuing the Company's objectives. Violation of the provisions of the Ethical Code will therefore constitute a breach of the obligations arising from relationships of any kind with the Company and, therefore, a disciplinary offense, with all legal consequences, including termination of the employment relationship.

Failure to comply with and/or violate the rules of conduct defined in this Code by Company employees constitutes a breach of the obligations arising from the employment relationship pursuant to Article 2104 of the Italian Civil Code and a disciplinary offense subject to sanctions under applicable contractual provisions.

Failure to comply with and/or violation of the rules of conduct set forth in this Code by other recipients of the Code will result, for employees, in sanctions deriving from the specific clauses included in the contractual relationship, and, for directors, in notification to the Shareholders' Meeting and appropriate legal action.

Following the ascertainment of a violation of the Ethical Code, disciplinary proceedings will be initiated with the competent body to impose the sanction deemed necessary and proportionate to the violation committed, based on the guidelines contained in the disciplinary system adopted by the Company.

The Company undertakes to impose disciplinary sanctions by the competent body consistently, impartially, and uniformly, while respecting the limits imposed by law and industry collective bargaining agreements.

The Chairman will promptly inform the Board of Directors of any disciplinary measures imposed by the Company for violations of the Ethical Code.

The confidentiality of the whistleblower's identity is guaranteed, as is protection from any type of retaliation.