



## COMPANY CODE OF ETHICS

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## FOREWORD

### Introduction

With this Code of Ethics (hereinafter referred to as the "Code"), **Tecnocap TL S.r.l.** (hereinafter also referred to as "Tecnocap TL" or the "Company") aims to promote the set of values that the Company adheres to and respects for the proper functioning of the business. Tecnocap TL S.r.l. conducts its activities with the utmost transparency and ethics, with moral integrity and fairness, pursuing its statutory objectives while respecting its corporate mission.

With the approval of this Code, Tecnocap TL S.r.l. declares its intention to base its activities on the principles contained herein and to not enter into or continue any relationship with anyone who demonstrates a failure to share its spirit or who violates its principles and rules of conduct.

The Code of Ethics is an integral part of the **Organizational, Management, and Control Model** provided for under Article 6 of Legislative Decree No. 231/2001, and adopted by Tecnocap TL S.r.l. in accordance with the same Decree.

### The mission of Tecnocap TL S.r.l.

The company operates predominantly in the **packaging sector**, focusing on the industrial production and commercialization of aluminum containers and related packaging products, such as aerosol cans.

### Recipients of the Code of Ethics

The recipients of the Code of Ethics are the members of the corporate bodies and the Sole Shareholder, management personnel, employees, collaborators, intermediaries (e.g., agents, business brokers, etc.), business partners, and external collaborators,

understood as those who act on behalf of or in the interest of Tecnocap TL S.r.l., regardless of the legal nature of the relationship.

Recipients are required to observe and, to the extent of their responsibility, ensure compliance with the principles set forth in this Code. Under no circumstances can the claim of acting in the interest of the Company justify behavior contrary to the principles outlined here, or to applicable laws and/or regulations.

Tecnocap TL S.r.l.'s interlocutors, defined as those who interact with the Company in various capacities (e.g., suppliers, clients, Public Administration, Authorities with inspection powers, etc.), are made aware of the existence of this Code of Ethics.

In its relationships with all other interlocutors, Tecnocap TL S.r.l. prefers to engage with parties that act according to ethical conduct similar to that expressed in this Code.

## Structure of the Code of Ethics

This Code of Ethics consists of four sections:

- The **first section** – "General Ethical Principles" explains the values and principles that the recipients of the Code must adhere to.
- The **second section** – "Code of Conduct" outlines the conduct criteria and behavior that the recipients must follow in order to respect the values and principles of Tecnocap TL S.r.l.
- The **third section** – "Rules and Regulations for the Prevention of Crimes Provided for in Legislative Decree No. 231/2001" summarizes the main rules of conduct aimed at preventing crimes under Legislative Decree No. 231/2001.
- The **fourth section** – "Implementation Provisions" identifies those responsible for the Code of Ethics, explains how its contents should be applied in practice, and outlines the disciplinary system in case of violations of the Code of Ethics.

## SECTION ONE

### 1. General Ethical Principles

This section explains the fundamental ethical principles of Tecnocap TL S.r.l., which form the basis of the company's culture and the standard of conduct for all recipients of the Code of Ethics in conducting business and their activities

## 1.1 Transparency and Fairness

Promote relationships based on **transparency** and **fairness**, ensuring completeness, reliability, consistency, and timeliness of information, while avoiding misleading communications and behavior that could take undue advantage of others' positions of weakness or lack of knowledge. Communication must be **simple, understandable, accessible, timely, and truthful**.

## 1.2 Moral Integrity

Adopt morally **upright** behavior consistent with this Code, as well as with the applicable laws. For example, avoid accepting gifts or benefits that exceed normal business courtesy and resolve situations where interlocutors may find themselves in a potential **conflict of interest**.

## 1.3 Legality

Pursue objectives and operate in **strict compliance with the laws** and regulations in force in Italy and in all countries where the Company operates. Under no circumstances should the belief of acting in the interest of the Company justify conduct that violates the laws or regulations mentioned above.

## 1.4 Respect and Protection of the Individual

Consider employees as a valuable resource for the Company's success and, consequently, **protect and promote** the value of human resources to enhance and improve the Company's assets and competitiveness through the skills of each employee or collaborator.

Respect the **fundamental rights** of individuals, protecting their moral integrity and ensuring **equal opportunities**. In both internal and external relationships, reject any form of discrimination based on political or union opinions, religion, race or ethnic origin, nationality, age, gender, sexual orientation, health status, marital status, disability, physical appearance, socioeconomic status, and, in general, any individual characteristic of the human person.

## 1.5 Loyalty

Ensure the highest level of **loyalty** in all relationships, both internal and external, by ensuring faithfulness to promises and agreements, even in the absence of written evidence. Act with a sense of responsibility and in complete good faith in every activity or decision.

## 1.6 Effectiveness and Efficiency

Continuously improve the **effectiveness** and **efficiency** of services by adopting **quality improvement plans** with technological and organizational solutions that combine customer satisfaction with operational efficiency and cost-effectiveness.

## 1.7 Fair Competition

Recognize the fundamental importance of a **competitive market**, complying with legal standards. The Company avoids practices (e.g., forming cartels, dividing markets) that could represent a violation of competition laws. In the context of fair competition, Tecnocap TL S.r.l. does not knowingly infringe the **intellectual property** rights of others.

## 1.8 Conflict of Interest

A **conflict of interest** refers to any situation, occasion, or relationship in which, even potentially, personal interests or those of connected persons (e.g., family or friends) or organizations with which one is involved in some capacity, could impair the duty of impartiality. Recipients must avoid allowing any personal interest to take precedence over the Company's interests and/or interfere with the choices made in carrying out their work activities.

Anyone who becomes aware of even the possibility of a conflict of interest must immediately inform their supervisor or, in any case, the Company's top management and/or the **Supervisory Body**.

## 1.9 Anti-corruption

Recognize the importance of **ethical integrity**, **transparency**, and **fairness** in dealings with third parties (both public and private). All forms of corruption are strictly prohibited in favor of anyone.

## 1.10 Confidentiality and Privacy

Ensure the utmost **confidentiality** of information acquired and/or processed during the course of one's duties or functions, which constitutes the Company's assets or relates to the activities of Tecnocap TL S.r.l. Also ensure that the information obtained is not used for personal gain or in a way that is contrary to the law or harms the Company's rights, assets, or objectives.

To this end, define **specific confidentiality rules** to prevent improper disclosure. Particular attention must be paid to **personal data** protected by national and international regulations in force. Tecnocap TL S.r.l. protects the privacy and **data protection rights** of all recipients of this Code of Ethics, according to current regulations, and undertakes not to disclose or share personal data without the prior consent of the data subject, except for legal obligations. The collection, processing, and storage of this information take place within specific procedures designed to ensure that unauthorized individuals cannot access it and in full compliance with applicable laws.

### 1.11 Responsibility Towards the Community

Operate with consideration for the needs of the communities in which the Company operates and contribute to their **economic, social, and civil development**.

### 1.12 Physical Integrity Protection

Guarantee an adequate working environment in terms of **health and personal safety**, by adhering to the required levels of protection and prevention provided for by current regulations and continuously improving safety conditions.

### 1.13 Protection of the Natural Environment

Promote **respect for the environment**, considered a common resource to be protected for the benefit of the community and future generations, with a view to sustainable development.

## SECTION TWO

### 2. Code of Conduct

This section explains the behavior and conduct that recipients must follow to comply with the company's values and principles.

#### 2.1 Stakeholders of Tecnocap TL S.r.l.

Tecnocap TL S.r.l. identifies its stakeholders as:

- Public Administration
- Corporate bodies

- Sole Shareholder
- Employees and collaborators
- Media
- Suppliers
- Partners
- Customers

## 2.2. Relations with the Sole Shareholder

**Tecnocap TL S.r.l.** pursues its corporate objectives in compliance with the law, the company's statutes, and internal regulations, ensuring the proper functioning of corporate bodies and safeguarding the participatory and property rights of the Sole Shareholder, while protecting the integrity of the company's share capital and assets. The Company maintains constant dialogue with the Sole Shareholder, ensuring fairness, clarity, and equal access to information to prevent its improper use.

## 2.3 Relations with Corporate Bodies

The Board of Directors is guided by the principles of the Code of Ethics when defining corporate objectives. **Tecnocap TL S.r.l.** guarantees maximum cooperation and transparency in its relations with the Sole Auditor, so that they may consult data and documents and obtain the necessary information to carry out their institutional role. Employees of the Company must refrain from any behavior that could be interpreted as denial or obstruction of the Sole Auditor's work during their research and control activities.

## 2.4 Relations with Employees

**Tecnocap TL S.r.l.** considers its human resources as strategic to the success of the company and, consequently, to the enhancement of the Sole Shareholder's investment. **Tecnocap TL S.r.l.** recognizes that achieving corporate goals depends on having qualified and loyal employees. In this context, creating and maintaining a serene and proactive work environment is of primary importance, to be achieved through respect for the privacy of employees and the protection of equal opportunities. The company ensures career paths based solely on personal merit and skills, aimed at strengthening the professionalism of each individual.

Additionally, **Tecnocap TL S.r.l.** guarantees its employees a training path that aligns corporate growth needs with the training needs expressed by the workers, and provides suitable tools for professional development and updating.

## 2.5 Relations with Clients

The success of **Tecnocap TL S.r.l.** is primarily based on its ability to identify and meet the client needs. The Company, committed to continuously improving its performance, guarantees its customers prompt, qualified, and competent responses to their needs. **Tecnocap TL S.r.l.** constantly works to understand and anticipate these needs. The Company places great importance on the trust placed in it by its customers and ensures that its employees continually improve their professional skills, enabling them to provide suitable responses to customer requirements. The Company fosters **informed, shared, and conscious decision-making** while avoiding any form of pressure.

The Company is committed to offering clients, with efficiency and courtesy, high-quality products and services that can meet even the highest expectations and needs. Furthermore, the Company strives to provide the best assistance throughout all phases of the relationship, ensuring availability at any time.

**Tecnocap TL S.r.l.** pays close attention to **Customer Satisfaction** activities to ensure continuous improvement in the quality of services and products offered, gathering suggestions or complaints from clients through appropriate communication systems. Monitoring customer-perceived quality helps identify potential areas of concern and impacted processes, allowing for appropriate corrective actions.

The Company is committed to basing its relationships with customers on simplicity, clarity, and transparency, avoiding any misleading practices in order to establish and maintain a solid relationship inspired by the principles and values of **Tecnocap TL S.r.l.**

## 2.6 Relations with Suppliers, External Collaborators, and Partners

When selecting suppliers and external collaborators, **Tecnocap TL S.r.l.** takes into account economic convenience, technical expertise, reliability, suppliers' compliance with the Company's quality procedures, their credentials, and their ability to ensure compliance with the law and this Code.

The Company establishes relationships with suppliers and external collaborators based on **clarity, transparency, equality, loyalty, and fair competition**, ensuring that suppliers who meet the necessary requirements are treated uniformly and have equal opportunities in the selection process. The Company avoids creating any form of dependence and ensures that no entity is excluded from competing for contracts with the Company.

**Tecnocap TL S.r.l.** develops **partnerships** with counterparts of solid reputation and experience. The Company establishes long-term relationships with its partners in a fair, complete, and transparent manner, in compliance with current legislation and this Code.

## 2.7 Relations with Public Administration

All relations between the Company and **Public Administration** must be conducted with the utmost **fairness, transparency, collaboration, and non-interference**, in respect of each party's roles, current legislation, and the provisions of this Code of Ethics. These relations are reserved for the Company bodies specifically delegated for such purposes.

## 2.8 Relations with the Media and Communication

**Tecnocap TL S.r.l.** ensures that all information and communication concerning the Company are **accurate, complete, truthful, and transparent**. Relations with the media are reserved for the corporate bodies delegated for this purpose. Employees and collaborators are prohibited from providing information to the media without prior and specific authorization from the relevant corporate functions.

## 2.9 Internal Control System

**Tecnocap TL S.r.l.** considers an **adequate and healthy control environment** to be a fundamental aspect of its organizational culture, with the ultimate goal of improving the efficiency and effectiveness of business relationships, raising awareness, and further promoting accountability in the workplace.

**Tecnocap TL S.r.l.** is committed to maintaining an **adequate Internal Control System (ICS)**, under the responsibility of the Board of Directors and managed by the individual members in collaboration with various corporate departments for all processes for which they hold management responsibility and specific expertise. This Control System aims to ensure:

- The achievement of corporate objectives;
- The safeguarding of corporate assets;
- The adoption of behaviors and processes that ensure compliance with current laws and conformity to internal directives;
- The effectiveness, efficiency, and cost-effectiveness of corporate activities;

- The reliability and accuracy of information, including accounting and financial data, that circulates within the company or is disclosed to third parties and the market;
- The confidentiality of corporate information that has been made public.

## 2.10 Accounting Transparency

**Tecnocap TL S.r.l.** ensures complete transparency, accuracy, reliability, and completeness of accounting information. To this end, the Company has established an administrative-accounting system that **reliably** represents management facts correctly and promptly, and provides tools to prevent, identify, and manage financial and operational risks.

Financial documentation is prepared in compliance with the criteria established by law and applicable generally accepted accounting principles. Accounting entries must reflect exactly what is supported by documentation, meaning they must be based on accurate, timely, and verifiable information.

Each employee is required to cooperate in ensuring that management facts are represented accurately and promptly in the accounts. For every transaction, adequate supporting documentation must be kept on record.

## 2.11 Gifts, Sponsorships, Donations, and Liberalities

It is prohibited to directly or indirectly provide or offer money or material benefits of any kind to third parties, public officials, or private individuals to obtain undue advantages (e.g., to influence or reward an act of their office). **Acts of commercial courtesy**, such as gifts or hospitality, are permitted only if they are of modest value (not exceeding €150) and are such that they do not influence the recipient's independence of judgment and cannot be interpreted by an impartial observer as aimed at obtaining improper advantages.

In any case, this type of expenditure must always be authorized by the Board of Directors and properly documented.

**Tecnocap TL S.r.l.** employees are prohibited from accepting gifts or favors that do not fall under normal business courtesy. An employee of **Tecnocap TL S.r.l.** who receives an inappropriate gift, or one not limited to honoring a simple relationship of courtesy, must immediately notify their supervisor, so that it can be returned to the sender, accompanied by a written reference that explains to the donor the policy clearly expressed in the Code of Ethics regarding this matter.

External collaborators of **Tecnocap TL S.r.l.** are asked to adhere to the principles contained in the Code. Any **sponsorships, donations, and liberalities** are the responsibility of the Company's leadership. The Company favors initiatives that align with its strategic objectives, offer a guarantee of quality, stand out for their ethical message, and contribute to **social development**.

## 2.12 Participation in Associations, Initiatives, Events, or External Meetings

Participation in associations, initiatives, events, or external meetings is encouraged by **Tecnocap TL S.r.l.** as long as it is compatible with work or professional duties. This includes participation in associations, conferences, congresses, seminars, courses; writing articles, essays, and publications; and attending public events.

In this regard, the management and employees of **Tecnocap TL S.r.l.** who are called upon to present or provide external data or information about the Company's objectives, activities, results, and viewpoints, are required—besides complying with corporate procedures on **market abuse**—to obtain authorization from **Tecnocap TL S.r.l.** for the lines of action to be followed, as well as for the prepared texts and reports. They must also coordinate the content with the Company.

## 2.13 Use of Corporate Assets

Each employee of **Tecnocap TL S.r.l.** is required to operate with the necessary diligence to protect corporate assets, through responsible behavior that aligns with operational procedures designed to regulate their use, as well as with current regulations. Employees must avoid improper uses that could harm third parties or otherwise conflict with the Company's interests. Similarly, employees must not only protect these assets but also prevent their fraudulent or improper use for personal gain, third-party benefit, or even the benefit of **Tecnocap TL S.r.l.**

## SECTION THREE

### 3. Rules and regulations for the prevention of crimes under the Leg. Decree No. 231/2001

#### 3.1 Rules and Regulations for Relations with Public Administration

**Tecnocap TL S.r.l.** bases its conduct on respect for the principles of impartiality and good performance that the Public Administration is required to follow.

Individuals tasked with handling any negotiations, requests, or institutional relations with the Public Administration must not seek to improperly influence decisions or engage in illegal behavior, such as offering money or other benefits, that could affect the impartiality of judgment by the representative of the Public Administration.

It is considered illegal to use altered or falsified statements or documents, omit information, or, in general, engage in deceptive actions in order to obtain concessions, authorizations, funding, or contributions from the European Union, the State, or other Public Entities.

Hiring former Public Administration employees, who in their roles had dealings with **Tecnocap TL S.r.l.**, or their relatives and/or associates, must strictly follow the company's established hiring procedures.

Other employment relationships with former Public Administration employees, or their relatives and/or associates, must also comply with internal procedures.

**Tecnocap TL S.r.l.** uses the contributions, subsidies, or funding obtained from the European Union, the State, or other Public Entities for the purposes for which they were requested or granted.

#### 3.2 Rules and Regulations for the Protection of IT and Non-cash Payment Instruments

Directors, employees, and external collaborators must strictly adhere to the company's procedures and/or policies on IT security. They must use corporate resources, such as personal computers, telephones, and other communication devices, in accordance with these procedures and/or policies, avoiding any behavior that could compromise the functionality or protection of the company's IT system.

It is prohibited to alter the functioning of the company's telematic or IT system or the data and information contained within it, or to interfere with programs and databases for any purpose.

Additionally, each recipient must:

- Avoid uploading unauthorized or borrowed software onto company systems and refrain from making unauthorized copies of licensed programs for personal, corporate, or third-party use or from distributing such programs.
- Refrain from unlawfully reproducing, distributing, publicly displaying, extracting, duplicating, or commercializing software and/or the content of a database in violation of copyright laws, particularly **Law No. 633/1941**.
- Avoid the unauthorized use, falsification, or alteration of credit or payment cards, or any similar documents enabling the withdrawal of cash or the purchase of goods or services, and refrain from possessing or distributing devices, equipment, or software designed to commit crimes related to non-cash payment instruments.

### **3.3 Rules and Regulations for Combating Organized Crime**

**Tecnocap TL S.r.l.** firmly condemns and combats any form of organized crime, including mafia-related activities, using all available means.

Particular caution must be exercised by recipients when operating in areas, both in Italy and abroad, that are historically affected by organized crime, in order to prevent the risk of criminal infiltration.

**Tecnocap TL S.r.l.** will make every effort to verify the integrity and reliability of its commercial counterparts (such as suppliers, customers, consultants, and joint ventures).

No commercial relationships will be established or continued with counterparts suspected of being affiliated with or close to organized crime, or suspected of facilitating criminal organizations in any form, even occasionally.

### **3.4 Rules and Regulations for the Prevention of Crimes Against Industry and Commerce**

Recipients are prohibited from engaging in the sale of products or services with qualities or technical characteristics different from those specified or bearing names, trademarks, or distinctive signs that could mislead the final consumer about the quality of the offered products or services.

### 3.5 Rules and Regulations for the Prevention of Corporate Crimes

**Tecnocap TL S.r.l.** condemns any behavior aimed at altering the accuracy and truthfulness of data and information contained in financial statements, reports, or other legally required corporate communications directed to the Sole Shareholder and the public.

All individuals involved in the preparation of such documents must verify, within the scope of their responsibility, the accuracy of the data and information to be included in these documents.

**Tecnocap TL S.r.l.** requires its collaborators to act with integrity and transparency in their roles, particularly in responding to requests made by the Sole Shareholder, the Sole Auditor, or the Board of Directors in the exercise of their institutional functions.

It is prohibited for the Board of Directors to engage in any actions that may harm the integrity of the company's assets or cause damage to the Sole Shareholder.

The Board of Directors must not carry out any corporate transactions that could harm creditors.

It is forbidden to engage in any simulated or fraudulent acts aimed at influencing the Sole Shareholder's decision-making to irregularly form a resolution different from what would otherwise have been adopted.

It is prohibited to intentionally disseminate false information within or outside the company regarding **Tecnocap TL S.r.l.** and its collaborators, with full awareness and knowledge of its falsity.

During inspections or audits by competent public authorities, collaborators must demonstrate maximum cooperation and must not obstruct the inspection and control functions in any way, to ensure the proper fulfillment of their tasks.

### 3.6 Rules and Regulations for Relations with Private Entities

**Tecnocap TL S.r.l.** maintains relationships only with private entities that have a solid reputation for honesty and integrity in conducting their business.

The Company promotes the development of a "culture of respect" based on integrity and the promotion of **transparent practices** in relationships with private entities.

**Tecnocap TL S.r.l.** prohibits and does not tolerate illegal behavior, such as offering or receiving money or other benefits, aimed at securing or maintaining business or gaining an unfair advantage for the Company.

Employees of **Tecnocap TL S.r.l.**, and more generally the recipients of the Code of Ethics, avoid personal involvement and ensure that the Company is not implicated in any form of **corrupt behavior** (transactions, activities, and relationships with third parties that could lead to criminal charges or corporate liability, etc.).

**Tecnocap TL S.r.l.** informs its employees and third parties about its anti-corruption policies.

### **3.7 Rules and Regulations for the Prevention of Crimes Against Individual Personality**

**Tecnocap TL S.r.l.** places a high value on the protection of individuals, their freedom, and their personal integrity. The Company strongly rejects any form of exploitation or subjugation of individuals, as well as any activity that could harm an individual's physical safety.

**Tecnocap TL S.r.l.** condemns any behavior that is coercive, offensive, threatening, or aimed at intimidating individuals, including all practices related to **mobbing**.

Harassment is prohibited, whether based on gender, sexual orientation, identity, individual expression, race, age, religion, disability, ethnic group, or other protected classes, regardless of who commits the act or who the victim is within **Tecnocap TL S.r.l.**

Any harassment experienced must be reported to the immediate supervisor or the next-level supervisor if it concerns them. All harassment reports will be promptly investigated and kept confidential.

No one will be discriminated against for reporting harassment or participating in investigations related to such reports.

It is also forbidden, based on publicly available or legally permitted information, to establish or maintain relationships with individuals who, directly or indirectly, obstruct human development, fail to respect human dignity and individual personality, or violate fundamental human rights.

It is further prohibited to acquire, use, distribute, and/or transfer child pornography material, even through the use of IT systems and virtual images.

### 3.8 Rules and Regulations for the Protection of Health and Safety in the Workplace

**Tecnocap TL S.r.l.** is committed to spreading and consolidating a **safety culture**, raising awareness of risks, ensuring knowledge of and compliance with current regulations on the prevention and protection of health and safety in the workplace, promoting and demanding responsible behavior from all employees, external collaborators, contractors, and joint venture partners, within their respective areas of responsibility, and working to preserve and improve, particularly through preventive actions, working conditions, and workers' health and safety.

The Company's activities must be carried out in full compliance with current prevention and protection regulations, particularly those provided in **Legislative Decree No. 81/2008** and specific applicable safety regulations.

The Company's operational management must follow advanced criteria for environmental protection and energy efficiency, aiming to improve health and safety conditions in the workplace, including but not limited to the reasonable prevention of **involuntary manslaughter** and **serious or very serious personal injuries** committed in violation of health and safety regulations.

The fundamental principles and criteria guiding the Company's decisions on workplace health and safety are:

- Avoiding risks;
- Assessing unavoidable risks;
- Combating risks at their source;
- Adapting work to people, particularly regarding the design of workstations and the selection of work equipment and methods of work and production;
- Considering the level of technical evolution and ensuring continuous updates;
- Replacing what is dangerous with what is not or less dangerous;
- Planning prevention with a coherent approach that integrates techniques, work organization, working conditions, social relations, and environmental factors;
- Prioritizing **collective protection** measures over individual protection measures;
- Providing workers with appropriate instructions, including specific training courses.

**Tecnocap TL S.r.l.** is also committed to ensuring the protection of working conditions concerning the physical and psychological well-being of workers and

respecting their moral personality, preventing any illicit conditioning or undue discomfort.

Being under the influence of alcohol, drugs, or similar substances during work or in the workplace is considered a **deliberate assumption of risk** that endangers these values.

Chronic addiction that affects the work environment will be treated similarly, and **Tecnocap TL S.r.l.** is committed to supporting the social actions provided in this area by labor contracts.

### 3.9 Rules and Regulations for Environmental Protection

**Tecnocap TL S.r.l.** is aware of the direct and indirect effects of its activities on economic and social development and the general well-being of the community, as well as the importance of social acceptance by the communities where it operates.

The Company, therefore, plans its activities with a focus on balancing economic initiatives with essential environmental needs, not only in compliance with current regulations but also in consideration of the rights of future generations.

**Tecnocap TL S.r.l.** is committed to ensuring that its projects, processes, methodologies, and materials take into account scientific research developments and the best environmental practices, to respect territorial balance, prevent pollution, and protect the environment and landscape.

The Company has adopted an effective set of corporate rules that consider all national and international regulations on the matter. The fundamental principles it follows are:

- Preventing and, if not possible, minimizing all forms of pollution;
- Constantly optimizing the use of all resources;
- Educating stakeholders to adopt environmentally respectful behavior;
- Conducting all necessary controls to avoid environmental damage;
- Minimizing waste generated by company activities and ensuring its proper management, using specialized and qualified entities when necessary.

**Tecnocap TL S.r.l.** aims to maintain public trust in the integrity of its activities through open communication and dialogue with other entities, to improve awareness of environmental issues related to its activities.

### 3.10 Rules and Regulations for the Prevention of Crimes Related to Receiving, Laundering, and Using Money, Goods, or Benefits of Illicit Origin, and Self-laundering

Recipients of the Code of Ethics must never engage in or be involved in activities that could implicate **money laundering** (i.e., the acceptance or processing of assets or money from criminal activities) in any form or manner, strictly complying with applicable anti-money laundering laws.

Employees and directors must conduct a preliminary check of available information (including financial data) about commercial counterparts, including joint ventures, consultants, suppliers, and partners, to verify their **moral integrity**, ethics, and respectability, and the legality of their activities before entering into business relationships with them.

The Company must always comply with national and international laws on **organized crime** and anti-money laundering, in any relevant jurisdiction.

The Company's directors, employees, and external collaborators must strictly comply with applicable laws and regulations, as well as corporate policies and/or procedures, in any financial transaction they are involved in, ensuring **full traceability** of incoming and outgoing financial flows and full compliance with anti-money laundering laws.

Recipients are free to make personal **political donations** to candidates, parties, or committees of their choice, within the limits set by law. Under no circumstances will recipients be reimbursed or compensated for any personal political donations.

Every **Tecnocap TL S.r.l.** transaction and operation must be legal, consistent, and appropriate, correctly authorized, and properly recorded so that the related decision-making, authorization, and execution process can be verified at any time.

No financial movement can take place without complying with **Tecnocap TL S.r.l.**'s established procedures and without proper supporting documentation.

### 3.11 Rules and Regulations for the Protection of Industrial and Intellectual Property

**Tecnocap TL S.r.l.** operates in full respect of the industrial and intellectual property rights legitimately belonging to third parties, as well as of laws, regulations, and conventions, including those of the European Union and/or international agreements protecting such rights.

In this regard, all recipients must respect the legitimate industrial and intellectual property rights of third parties and refrain from unauthorized use of these rights, knowing that violations can have negative consequences for the Company.

In particular, recipients, in the exercise of their activities, must refrain from any conduct that may constitute the **usurpation of industrial property titles** or the **alteration or counterfeiting of trademarks**.

Furthermore, all recipients must refrain from using any **protected works** (or parts of them) unlawfully and/or improperly, whether for personal, corporate, or third-party benefit, in violation of **copyright laws**, particularly the **Copyright Law (Law No. 633/1941)**.

### **3.12 Rules and Regulations for Relations with Judicial Authorities and Law Enforcement Agencies**

Relations with **Judicial Authorities** and **Law Enforcement Agencies**, at any level, must be based on maximum **transparency, fairness, and cooperation**.

Recipients of this Code of Ethics, particularly when involved in legal proceedings, must avoid adopting reticent, misleading, or obstructive behavior that may, even indirectly and/or unintentionally, hinder the work of justice.

Similarly, recipients must refrain from exerting pressure or threats, including physical violence, or offering money or other benefits, to induce someone not to testify or to provide false testimony before a **Judicial Authority**.

### **3.13 Rules and Regulations for the Prevention of Crimes Related to the Employment of Third-country Nationals with Irregular Status**

**Tecnocap TL S.r.l.** considers it an essential principle to employ only workers and laborers from outside the European Union who fully comply with current immigration laws.

The Company commits to not employing third-country nationals who do not have a valid residence permit, as required by current immigration laws.

**Tecnocap TL S.r.l.** requires all its collaborators and suppliers to employ only third-country nationals with valid residence permits.

### 3.14 Rules and Regulations for the Prevention of Crimes of Racism and Xenophobia

**Tecnocap TL S.r.l.** considers it an essential value to respect the law in the fight against any form or expression of **racism** and **xenophobia**. The Company, therefore, rejects any activity that may promote ideas based on racial or ethnic superiority or hatred, incitement to commit or commit acts of discrimination based on race, ethnicity, nationality, or religion, incitement to commit or commit violence or provocative acts of violence for racial, ethnic, national, or religious reasons, including when such behavior involves **denying, seriously minimizing, or apologizing for the Holocaust**, or other **genocides, crimes against humanity, and war crimes**.

### 3.15 Rules and Regulations for the Prevention of Tax Crimes

**Tecnocap TL S.r.l.** is committed to effectively taking all necessary measures to prevent and avoid any conduct that may lead to the risk of committing tax crimes. Recipients of the Code of Ethics must be aware of and comply with tax regulations and the instructions of the relevant authorities. They are prohibited from engaging in, contributing to, or causing any actions or omissions that may constitute, directly or indirectly, such crimes, including in the context of cross-border fraudulent schemes.

**Tecnocap TL S.r.l.** is committed to following and adhering to rules that ensure compliance with tax regulations, as well as the traceability and transparency of the decisions made. The Company pays particular attention to all activities concerning the proper accounting of invoices or other documents, the comprehensive reporting activities for determining taxes, and the preparation of financial statements and accounting records.

**Tecnocap TL S.r.l.** is committed to avoiding the initiation or continuation of business relationships where there is a reasonable doubt that the counterparties may engage in criminal conduct aimed at committing tax crimes. Moreover, the Company ensures the proper and transparent accounting of all purchases, sales, and other expenses. All documents and accounting records are adequately stored in specific paper and/or digital archives, protected by appropriate security systems, to prevent any conduct involving the concealment and/or destruction of such documents.

## SECTION FOUR

### 4. Implementation provisions

#### 4.1 Code of Ethics Dissemination Methods

The Code of Ethics is made known to all recipients through specific communication activities. In particular, **Tecnocap TL S.r.l.** ensures the publication and dissemination of this Code, and any updates, via the company intranet, its official website, and in print, by making printed copies of the Code of Ethics available within the Company.

The Company is committed to promoting internal training programs aimed at spreading the contents of this Code at all levels.

#### 4.2 Code of Ethics Management and Application

**Tecnocap TL S.r.l.** has identified the **Supervisory Body** as the entity responsible for ensuring compliance with and the proper implementation of the principles outlined in the Code of Ethics. Therefore, the Supervisory Body:

- Verifies the application of the Code of Ethics, promoting any necessary initiatives for its updating;
- Engages with the relevant functions to encourage appropriate training programs;
- Clarifies interpretative doubts and ethical dilemmas;
- As the **Whistleblowing Manager** formally designated by the Company, collects reports of alleged violations;
- Conducts appropriate investigations, reports the findings to the relevant functions, and ensures that sanctions are applied;
- Complies with current legislation on protecting the confidentiality of the whistleblower's identity, the content of the report, and the prohibition against retaliation or discrimination against the whistleblower.

Internal reports of violations, even if only presumed, of the Code of Ethics can be submitted within **Tecnocap TL S.r.l.** to the **Supervisory Body**, as the Whistleblowing Manager, and the handling of these reports is conducted in accordance with **Legislative Decree No. 24 of March 10, 2023**, implementing Directive (EU) 2019/1937 concerning the protection of persons who report breaches of Union law and violations of national regulatory provisions, as well as in

compliance with the Company's **Procedure for Managing Reports of Unlawful Conduct**.

The **Supervisory Body** of **Tecnocap TL S.r.l.**, as the formally designated Whistleblowing Manager, is the sole recipient of reports, with the related guarantees for the whistleblower, in accordance with the provisions of current legislation and the aforementioned Procedure. Specifically, reports addressed to the **Supervisory Body** of **Tecnocap TL S.r.l.** may be submitted through the following internal reporting channels:

1. Written reports can be submitted in two sealed envelopes, including, in the first envelope, the whistleblower's identifying information along with an identity document, and in the second envelope, the subject of the report. Both envelopes should then be placed in a third sealed envelope marked "confidential/personal for SB" and sent by post to **Avv. Carmine Buoninconti, Piazza Risorgimento No. 10 - 20129, Milan**. In this case, the report can also be made using the "Report Form for Unlawful Conduct pursuant to Legislative Decree No. 24 of March 10, 2023," made available by the Company and distributed to all individuals, including those not physically present at the workplace but who are authorized to make whistleblowing reports. Reports received via this method are logged and recorded in a dedicated confidential register (of reports) by the **Whistleblowing Manager**.
2. Reports can also be made orally by calling **+39 3491552973**, through which the **Supervisory Body**, as the **Whistleblowing Manager**, upon the whistleblower's request and to ensure the requested anonymity, will schedule a direct meeting within fifteen days.

In the event that a report is received by anyone other than the **Supervisory Body** (for example, a hierarchical superior, a manager, etc.), the recipient must inform the sender that the report should be submitted to the **Supervisory Body** of **Tecnocap TL S.r.l.**, while simultaneously forwarding the report to the **Supervisory Body** within seven days of receipt.

The **Supervisory Body** reviews each report and conducts the necessary investigations, with the discretion required to prevent any retaliation, discrimination, or other forms of penalization against whistleblowers, in accordance with **Legislative Decree No. 24/2023** and the **Procedure for Managing Reports of Unlawful Conduct** adopted by **Tecnocap TL S.r.l.**

All the provisions of the aforementioned Procedure are incorporated into this Code of Ethics, and reference should be made, in particular, to paragraph 5.3 of the Procedure

concerning:

A) "**Confidentiality of the Whistleblower's Identity and the Report**" (Art. 12 of Legislative Decree No. 24/2023);

B) "**Protection Against Discriminatory or Retaliatory Measures**" (Arts. 17 and 19 of Legislative Decree No. 24/2023);

C) "**Extension of Protection**" (Arts. 3, Para. 5, and Arts. 17, Paras. 2 and 3, of Legislative Decree No. 24/2023);

D) "**Protection of Reporting in the Public Interest for the Disclosure of Information Covered by Secrecy**" (Art. 20 of Legislative Decree No. 24/2023);

E) "**Conditions for Protection and Consequent Responsibilities of the Whistleblower**" (Art. 16, Para. 3 of Legislative Decree No. 24/2023).

### 4.3 Disciplinary System

The Code of Ethics is an integral, substantive, and essential part of the contractual obligations of the recipients. Consequently, **Tecnocap TL S.r.l.** requires all recipients to strictly comply with the provisions contained herein. As it is made known to all recipients through various communication channels, any verified violation of the Code by a recipient constitutes sufficient grounds for terminating any employment or similar relationship, as well as any other form of contract, and may also result in compensation for damages caused by such violation to **Tecnocap TL S.r.l.**

Any disciplinary measures against violators are evaluated and determined, based on the type and severity of the committed violation, by the relevant department, which manages relationships in various forms in collaboration with the **Board of Directors**. These sanctions represent the application of the disciplinary system already provided by applicable legislation and national collective labor agreements (CCNL).

The relevant department is required to inform the **Supervisory Body** in advance if the violation of the Code of Ethics is significant under **Legislative Decree No. 231/2001**.

Any individual involved in intimidation or retaliation against those who make good-faith reports will be subject to disciplinary action, including the possible termination of employment.