ART SPA Code of Social Ethics
Rev. 07

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ART SPA CODE OF SOCIAL ETHICS

The Code of Ethics is the company's "Constitutional Charter", a charter of moral rights and duties that defines the ethical and social responsibility of every participant in the organization.

The Code of Ethics is an effective means of preventing irresponsible or unlawful behaviour by those who work in the name and on behalf of the company because it introduces a clear and explicit definition of one's ethical and social responsibilities towards all those involved directly or indirectly in the company's activities (customers, suppliers, partners, citizens, employees, collaborators, public institutions, associations and anyone else affected by the company's activities). The fundamental ethical principles of ART SPA are defined in this Code of Ethics so that they may constitute the standard of conduct for all collaborators in the performance of their business and their activities.

However, the Code of Ethics does not replace and does not supersede the laws in force an the existing National Collective Labour Agreement.

On 8 June 2001, the Italian legislator issued legislative decree no. 231/2001 containing the "Discipline of the administrative responsibility of legal persons, companies and associations even without legal personality, pursuant to art. 11 of Law 29 September 2000, n.300".
The Decree introduced into Italian law the principle of the liability of entities for crimes committed, in their interest or to their advantage, by employees and/or other subjects indicated in article 5 of the Decree itself, such as directors, auditors, managers, representatives of the Company, as well as subjects subject to their management or supervision, unless, among other conditions, the Company has adopted and effectively implemented a suitable organisation, management and control model.
In this context, ART Spa has adopted an Organisation, Management and Control Model pursuant to Legislative Decree. 231 of 2001 and this Code of Social Ethics constitutes an integral and substantial part of it.

It is the responsibility of all employees and collaborators to observe its principles and to promote its dissemination and be an example of its practical application. They are bound to protect and preserve, through their own behaviour, the respectability and image of ART SPA as well as the integrity of its economic and human assets.

1 General ethical principles, entrepreneurial mission

The development model that ART SPA proposes is that of an enterprise that acts in the market as the bearer of morally high values: full compliance with the law, respect for the workers that make it up, integrity, fair competition and respect for the dignity of people.

ART SPA is therefore founded on the values of equality, fairness and solidarity and is bound to respect this Code of Conduct in all its acts, whether internal or directed towards the outside world. In this context, this Code constitutes a reference to which all those who contribute to ART SPA and, first and foremost, those who are called upon to manage it, must align their conduct.

1.1 ART SPA commitments

ART SPA undertakes

- to make this Code available and to ensure its dissemination;
- to ensure an adequate training and continuous awareness programme on issues related to the Code of Ethics;
- To include in the contracts stipulated with its suppliers, the adoption of this code in order to establish commercial relationships between the parties;
- Include the adoption of this code along the entire supply chain in the contracts stipulated with your suppliers;
- periodically check that the Code is being respected and complied with;
- adopt adequate procedures for the reporting, investigation and handling of any violations;
- to ensure the confidentiality of the identity of the person reporting any violations, without prejudice to legal obligations;
- to adopt an appropriate system of sanctions to target possible violations.

1.2 Commitments of ART SPA collaborators

Without prejudice to the legal and contractual provisions regarding the duties of workers, employees are required to be professional, dedicated, loyal, cooperative and mutually respectful. Each employee must direct his or her work towards professionalism, transparency, fairness and honesty, contributing with colleagues, superiors and collaborators in the pursuit of common goals.

Each employee must base his or her activity, whatever the level of responsibility associated with the role, on the highest degree of efficiency, complying with the operational instructions given by the hierarchical levels above. Each employee must behave, in relations with colleagues, according to the principles of civil coexistence and full cooperation and collaboration.

The code of ethics is an integral part of the employment relationship, all employees are required to behave and act in compliance with this Code, and to report any violations as soon as they become aware of them.

Collaborators include: directors, employees, and those who, by virtue of specific mandates or powers of attorney, represent the company towards third parties.

2 Ethical standards of conduct

2.1 Legality

All ART SPA collaborators are required to behave in compliance with the laws and regulations in force in the countries where they operate as well as with this Code.

2.2 Fairness and Equality

ART SPA respects the fundamental rights of individuals, protecting their moral integrity and guaranteeing equal opportunities. ART SPA undertakes not to discriminate on the basis of race, religion, nationality, political opinion or trade union affiliation, gender, sexual orientation or physical handicap. ART SPA works to guarantee, within the scope of its activities, the "Universal Declaration of Human Rights" and The Charter of Fundamental Rights of the European Union, in particular:

- (art. 21) prohibits any form of discrimination based, in particular, on sex, race, skin colour or ethnic or social origin, genetic characteristics, language, religion or personal beliefs, opinions political or of any other nature, belonging to a national minority, heritage, birth, disability, age or sexual orientation.

The Company actively promotes an inclusive work environment, where diversity is recognized and valued as a factor for growth and innovation.

Child labour and young workers

The company undertakes to carry out its activities in full compliance with the fundamental principles with regards to children's rights and the minimum working age, as recognised by national and international conventions and regulations; and in particular to

- not resort to or support the use of child labour, in line with the provisions of current legislation, relevant ILO Conventions and the International Convention on Children's Rights
- comply with the collective labour agreements and the laws and regulations in force regarding labour law
- comply with national legislation protecting the needs of student workers.

Woman rights

The art. 23 of the Charter of Fundamental Rights of the European Union affirms the right to equal treatment between men and women in all fields, including employment, work and remuneration.
Inspired by it, ART Spa undertakes to adopt all appropriate measures, including legislation, to ensure the full development and progress of women, with the aim of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a of equality with men.

Modern slavery and human trafficking

The Company has adopted a zero tolerance policy towards modern slavery, compulsory labour and human trafficking. ART SPA is committed to monitoring, developing and improving our activities to combat slavery and human trafficking.

The objective is to ensure that there is no trace of modern slavery or human trafficking, or other human rights violations, in our business operations or in any part of our supply chain.

ART SPA works to ensure, within the scope of its activities, the "Universal Declaration of Human Rights" and the Charter of Fundamental Rights of the European Union, in particular:
- (Art. 15) the right of every individual to work and to exercise a freely chosen or accepted profession.

Protection of the individual and development of collaborators

The valorization of human resources, the respect for their autonomy, incentives based on their participation in the company's decisions, are fundamental principles for ART SPA administrators, who will prepare professional development and training programmes aimed at enhancing specific professional skills and at preserving and increasing the skills acquired during collaboration. The professional development and management of collaborators are based on the principle of equal opportunities.

The essential criteria for the hiring of staff and career and salary advancement are established, as well as in accordance with the principles of ethical recruitment (i.e. respect for legality, in line with international labor standards and in a fair and transparent manner in compliance of human rights, in a fair and transparent way that respects human rights), from objective evaluations, from the recognition of the results achieved, from the skills expressed by people, from a transparent method of evaluation and communication.
Examples of unacceptable behaviours:
- mislead or defraud potential workers about the nature of the work,
- require workers to pay hiring fees and/or confiscate, destroy, hide and/or deny access to workers' passports and other government-issued identification documents.

Workers must receive a written notification at the start of their employment in a language they understand, truthfully and clearly stating their rights and responsibilities.

Harassment and violence in the workplace

The Company follows a zero-tolerance policy towards any form of harassment, violence, bullying or intimidating behaviour, whether physical, psychological, verbal or sexual, in the workplace or in related contexts.

Therefore, no behaviour that damages the dignity and integrity of individuals will be tolerated.

ART SPA is committed to ensuring a working environment that respects the dignity and integrity of every person, preventing and combating such conduct through:
- prevention and countermeasures, including:
  - awareness-raising and training measures,
  - secure and confidential internal reporting procedures;
- protection of whistleblowers from any form of retaliation;

- the adoption of disciplinary measures proportionate to the seriousness of the violations against anyone responsible for similar conduct.

Use of neutral and appropriate language

All ART SPA employees are required to use neutral, respectful and inclusive language in all communications, both internal and external. The use of discriminatory, offensive or derogatory terms, expressions or idioms that may harm the dignity of individuals or groups based on gender, ethnicity, age, sexual orientation, disability, religion or other personal characteristics is prohibited.

Freedom of association and the right to collective bargaining

The Company undertakes to guarantee freedom of association to all its workers, informing them of their rights to free association and collective bargaining.

In accordance with the provisions of the CCNL, the freedom of association of workers is guaranteed and no discrimination, harassment, intimidation or retaliation against trade union representatives or against any workers' representative may be implemented (as foreseen by the regulations in force - SA 8000, Health and Safety in the workplace – D.Lgs 231).

Furthermore, the Company shall not interfere in any way with the activities of trade unions and workers' associations in general, nor with their training or operation.

Rights of minorities and indigenous populations

The Company recognizes and respects the rights of the local communities in the areas in which it operates and over which it exercises direct influence. ART Spa is committed to contributing to ensuring dignified living conditions, education, employment, social activities and the right to free, preventive and informed consent (FPIC) to developments affecting these communities and the lands on which they live, with particular consideration for the presence of vulnerable groups.

Parenting and Work-Life Balance

ART SPA recognizes parenthood as a fundamental value and is committed to ensuring that no employee or collaborator is discriminated against on the basis of maternity, paternity or family care responsibilities. To this end, the Company undertakes to promote organizational methods that facilitate the elimination of any tension between of professional and private life, aimed at the well-being of individuals and the improvement of the corporate climate.

Wages and benefits

ART SPA recognizes the value of collective bargaining and guarantees its employees and collaborators a salary that complies with the provisions of the CCNL in force and applied in the company.

Workers are hired according to the provisions of the CCNL and salaries are paid according to contract and in the manner requested by the worker. They are entitled to all the benefits provided for by law (social security, parental leave, annual and public holidays, etc.).

Transparency

ART SPA must strive to ensure that its representatives and collaborators clearly, correctly and diligently convey the desired image of the company in all its relations and facilitate understanding. To this end, the most complete and transparent information possible regarding the guidelines of the company's activities is ensured.

2.3 Honesty

ART SPA must ensure that its representatives and collaborators are aware of the ethical significance of their actions and do not pursue personal or company profit to the detriment of compliance with the laws in force and with the rules set forth herein. In particular, it must avoid attributing illicit advantages to customers or suppliers. ART SPA must ensure that its representatives and collaborators do not operate in situations in which they hold, on their own behalf or on behalf of third parties, interests in conflict with those of their contractual counterparts.

Fair competition

ART SPA undertakes to protect the value of fair competition, refraining from collusive or predatory conduct and abuse of a dominant position. The company commits everyone to respect the regulations in force in all the locations where it operates.

Protection and preservation of resources and waste management

ART SPA dedicates the utmost attention to environmental issues, aiming to improve the environmental impact of its activities, prevent risks for the community and the environment in compliance with the regulations in force.

The addressees of this Code shall operate in order to:

- Avoid any unlawful discharge and emission of harmful materials or special waste;
- Treat waste in accordance with the specific requirements, at the various stages of the activities.
- Optimize separate waste collection systems;
- Reduce waste production.

All the addressees of this code are obliged to pay the utmost attention to strict compliance with environmental regulations. Any situation that may lead to violations of these rules must be reported.

2.4 Confidentiality – non-disclosure

ART SPA must ensure that its representatives and collaborators protect the confidentiality of all personal data contained both in databases and in personal archives, and must ensure that all the fulfilments foreseen by current privacy regulations are observed. The processing to which the data collected by means of specific company forms will be subjected, shall be directed exclusively to the fulfilment by ART SPA of the purposes pertaining to the specific exercise of the activity being carried out. The adoption of information management systems (certified or otherwise) is considered positive (e.g. ISO 27001 – TISAX ..ETC..).

Handling confidential company information

"Confidential information" is the knowledge of a project, a proposal, an initiative, a negotiation, an understanding, a commitment, an agreement, a fact or an event, even if future and uncertain, pertaining to the sphere of activity of ART SPA and its associated companies and with which ART SPA maintains relations of collaboration, which is not in the public domain and which, if made public, could be harmful to ART SPA and its associated companies.

Forecast and final accounting data, including consolidated data, of the company are also considered "confidential" until they are released to the public.

Employees who, for official reasons, become aware of confidential information, must not communicate it to third parties, except for official or professional reasons. Communications to third parties must state the confidential nature of the information transmitted and the obligation of confidentiality also on the part of the third party.

2.5 Health and Safety in the Workplace

ART SPA shall ensure that its representatives and collaborators adopt all the required safety measures and shall endeavour to promote working conditions and environments that protect the psycho-physical integrity of individuals and encourage pro-activeness, active participation and the ability to work as a team.

In the event that the current government is not able (due to resources or other constraints) to provide adequate protection for workers and the need is therefore recognized to protect its collaborators and/or property(ies) from particularly criticisms, ART Spa and its suppliers will have to evaluate the use of public and/or private security companies.

In such circumstances, companies must ensure that clear and rigorous operational procedures and terms of engagement are established by private security contractors before conducting any security operation to minimize the risks related to such activation, including that security forces private security personnel violate the company's operating procedures or rules of engagement.

Where a private security contractor breaches its operational procedures or rules of engagement, the contractor must have clear procedures in place to record and document any incidents, including establishing a complaints mechanism for local communities or other interested parties to file complaints regarding the actions of contracted private security forces. This complaints mechanism should be clear, transparent and accessible and appropriately address cultural or religious sensitivities. In the event that a private security contractor is found to have acted outside of operating procedure or rules of engagement, the company should consider terminating the vendor and hiring a new vendor or other remedies, depending on the case.

Definition of work environments, high-risk areas and access procedures.

Workplaces must also be designed in accordance with the principles of ergonomics, comfort, well-being and inclusion, taking into account the needs of all people – and, in general, all potential stakeholders who may access the Organization's properties - including those with disabilities or special needs. Like workplaces, the design of related signage must also take into account the needs of people with disabilities and use clear and inclusive language.

Workplaces must be regularly inspected and maintained so that defects that may affect workers' health and safety are eliminated as quickly as possible; adequate hygiene conditions must be ensured. Any specific risk areas must be appropriately marked and, if necessary, made accessible only to adequately trained and protected persons. Workplace management activities are guaranteed through specific procedures and instructions.

As part of training, the ergonomic aspect of the workstation for employees assigned to VDTs, which constitutes the majority of employees, is examined in depth with a special information booklet which describes the characteristics of the workstation and the worker's behaviour in terms of compliance with the rules.

2.6 Traceability of transactions

All ART SPA actions and operations must be recorded, authorized, verifiable, legitimate, consistent and appropriate. For each operation there must be adequate documentary support in order to verify the decision-making and authorization processes.

2.7 Sustainable development and ESG factors

In carrying out its activities, ART SPA is inspired, among other things, by a model of successful economic activity known as "Sustainable" according to the criteria known by the acronym "ESG": environmental sustainability (Environmental factor), social sustainability (Social factor), and strategy and risk governance (Governance factor).

- The Environment factor concerns a company's commitment to, among other things, the use of natural resources, respect for biodiversity, waste management, and the reduction of greenhouse gas emissions.
- The Social factor concerns human capital management, from respect for diversity and equal opportunities, to the well-being of all as well as relations and dealings with communities and suppliers, in addition to attention to health and safety in the workplace.

- The Governance factor concerns the company's commitment to corporate governance, also with a view to satisfying the two previous factors. Good governance therefore implies transparency, ethics, and integrity in corporate decisions, as well as the integration of sustainability policies into all corporate operations.

There are therefore many points of contact between the sustainable development of the company and the implementation of the Organization, Management, and Control Models relative to Legislative Decree 231/2001, both in terms of the internal control system and in terms of activities which may be considered sensitive.

The convergences relating to the internal control system concern the assumption that companies aiming for sustainable success cannot ignore the correct identification of risks and the related implementation of internal controls aimed at managing them. This same approach also characterizes the activities involved in implementing the Model, which consist of first identifying and then managing the risks to which the company is exposed, as well as providing, where appropriate, measures to prevent them.

With regards to the sensitive activities mapped in the relevant corporate context, it is clear that each ESG factor can be linked to various offences under Legislative Decree 231/2001.

For example, with regard to the Environment factor, it is easy to identify the connection with a specific provision contained in the Decree concerning environmental offences. Similarly, with reference to the Social matrix, reference is made to crimes against the individual, including specifically those of illegal intermediation and labor exploitation; conduct constituting racism and xenophobia; crimes relating to health and safety at work; and computer crimes related to the unlawful processing of data. Similarly, with reference to the Governance matrix, reference is made to corporate crimes; associative and transnational crimes, and conduct related to the code of corporate crisis and insolvency.

The interconnection between the Model and ESG factors can also be seen in the objectives set out in the 2030 Agenda for Sustainable Development, signed by 193 United Nations countries, including Italy. By way of example, we mention: the fight against climate change, responsible consumption and production, gender equality, the reduction of inequalities, decent work – economic growth and businesses, innovation and infrastructure.

Reading these objectives, it is clear that they are closely related to others that companies can pursue through the implementation of organizational, management, and control models. In other words, the Model plays a fundamental role in the full realization of ESG factors because, by providing rules of conduct for all company stakeholders, it allows them to be involved in sustainability strategies across the board.

ART SPA manages a process of integration of the relevant corporate processes that govern business risk management and sustainability issues. This involvement, strongly promoted by the Board of Directors, is ensured through continuous training, open communication, and the active involvement of all levels of the organization.

Only in this way can a corporate culture be created in which sustainability is integrated into strategic decisions and day-to-day operations.

In this context, the role of the Supervisory Body is fundamental, as it periodically verifies the adoption of operating standards in order to manage, reduce, or eliminate risks.

3 Ethics in business management

ART SPA management manages its affairs according to the rules of ethical business, in compliance with applicable laws and applying the ethical principles described here, and requires its collaborators, supply chain and partners to comply with this code in any circumstances.

3.1 Accounting transparency

ART SPA is aware of the importance of transparency, accuracy and completeness of accounting information and strives to have a reliable administrative-accounting system that allows:

- Produce accounting documentation (financial and economic) based on precise, exhaustive and verifiable information.

- Identify, prevent and manage possible financial and operational risks that could be harmful to ART SPA

- Carry out checks to safeguard the value of assets.

Prevention of money laundering, receiving stolen goods and utilities of illicit origin, as well as self-laundering

Corruption can take many forms that vary in intensity and is defined as the abuse of entrusted power for private gain. This can result in financial gain but also in nonfinancial benefits.
ART Spa adopts the highest ethical standards and is committed to full compliance with all anti-corruption and anti-bribery principles and laws in force where it operates. It is both illegal and contrary to the principles adopted by ART Spa, to pay or receive bribes or participate in any corruption scheme and may result in serious criminal and civil sanctions for those who commit such violations and for ART Spa.
In accordance with anti-corruption laws, ART Spa does not allow you to offer, give, receive, promise, authorize or pay any value (directly or indirectly) for corrupt purposes, to influence someone or secure an undue advantage (both public officials and private individuals).
ART Spa is aware of the central role of companies in the fight against money laundering, receiving stolen goods and self-laundering.
ART Spa therefore undertakes to implement anti-money laundering measures and therefore, among other obligations, it is explicitly forbidden to:

- purchase, replace or transfer money, goods or other benefits in the knowledge of their criminal origin, or carry out other operations in relation to them, in order to hinder the identification of their illicit origin;
- replace or transfer money, goods or other benefits deriving from a crime or carry out other operations in relation to them in order to hinder the identification of their criminal origin;
- use money, goods or other benefits in economic or financial activities in the knowledge of their criminal origin.

Economic-financial responsibilities - Correctness and transparency of company accounting information

ART Spa is aware of the importance of correct information on its activities for investors and the community in general. Consequently, within limits compatible with the confidentiality requirements inherent in running a business, ART Spa pursues the transparency of its financial responsibility and related relationships with stakeholders.
This transparency is also required of its suppliers.
Financial accountability refers to a company's responsibility to accurately record, maintain, and report on company records including, but not limited to, financial accounts, quality reports, time records, expense reports, and communications to customers or regulators, when appropriate.
Truthfulness, accuracy, completeness and clarity of the information constitute a fundamental value for ART Spa and represent the necessary conditions that allow a transparent accounting recording activity and, also in order to guarantee third parties the possibility of having a clear image of the economic situation, equity and financial position of the company.
The operations carried out must be documented in such a way as to verify all the steps, from the reason for the operation, to who carried out it up to the relative authorization also through adequate recording of the decision, authorization and implementation processes, ensuring the presence of adequate documentary support that allows carrying out checks at any time that certify the characteristics and reasons for the operation and identify the subjects who authorised, carried out, recorded and verified the operation itself.
All staff have the obligation to guarantee the maximum level of transparency and traceability of accounting operations, promptly reporting any inconsistencies or errors. The financial statements are subject to annual checks by the appointed external consultancy firm.
Relationships with the subjects who carry out auditing and accounting control activities are based on the principles of integrity, timeliness, correctness and transparency. For this reason, it is expected that the books and records are kept in compliance with the applicable law and with generally accepted accounting principles, even in the foreign countries in which ART Spa operates.
ART Spa also undertakes to comply with current customs legislation, also in order to guarantee the exact determination of border duties due for import or export operations and the correct fulfilment of the obligations deriving from it.

The Company ensures honesty, integrity and fairness in every area of its business and expects the same behavior in relations with all parties with which it establishes business relationships.

ART Spa prohibits behavior aimed at preventing or hindering, through the concealment of documents or other suitable devices, the carrying out of control or audit activities legally attributed to members, other corporate bodies or auditing firms.

3.2 Customer relations

ART SPA aspires to satisfy the expectations of its customers by providing them with quality products and services at competitive conditions, in compliance with the rules protecting

competition and the market, in order to develop and maintain lasting and favourable relations with them.

All ART SPA collaborators undertake, in their relations with customers, to apply the internal procedures, to respect the commitments and obligations assumed towards them, to provide accurate and truthful information, and to operate in compliance with the laws and regulations in force.

3.3 Supplier relations

The collaborators of ART SPA undertake to observe the internal procedures for the selection and management of suppliers, not to discriminate, allowing all those who have the requisites to compete for the assignment of contracts, to operate within the framework of the laws and regulations in force and to apply the conditions foreseen in the contract.

The selection of suppliers and the determination of purchase conditions must be based on an objective assessment of the quality, utility and price of the goods and services requested, of the counterparty's capacity to promptly supply and guarantee goods and services of a level adequate to meet ART SPA's needs, and of its integrity and solidity.

ART SPA employees are also committed to maintaining stable, transparent, collaborative and continuously improving relationships with suppliers, promoting the exchange of best practices and supporting suppliers in their own development towards higher ethical, social and environmental standards.

In order to promote healthy working conditions, human rights and environmental responsibility throughout the supply chain, ART SPA requires its suppliers to adopt the same standards, behaviors and commitments on the topics of this code, such as:

- Ethical standards of behavior (in terms of Legality, Fairness and Equality, Honesty, Confidentiality, Safety and Health in the Workplace, Traceability of operations)
- Ethics in business management (in terms of accounting transparency, relationships with customers, relationships with its suppliers)
- Protection of the context and stakeholders (in terms of worker protection, human rights, fair competition, counterfeit parts, intellectual and industrial property, export controls and economic sanctions, environmental protection, protection of resources and climate protection, management waste and reduction of CO2 emissions)
- Relations with Public Officials
- Relationships with representatives of political forces and interest-bearing associations
- ART SPA requires its suppliers to adopt and to respect of the sustainability requirements, in accordance to the “RESPONSIBLE SOURCING POLICY”, shared from ART to his suppliers.

Land, forest and water rights and forced evictions:

Suppliers agree to avoid forced eviction and deprivation of land, forest and water in the acquisition, development or other use of land, forest and water.

Right to verify and ensure compliance:

ART Spa reserves the right to conduct controls (audits) to ensure compliance with these requirements and also reserves the right to take appropriate measures, including the termination of any relationship with a supplier in the event that the supplier violates, does not resolve or is in the habit of violating this Policy. Art Spa also reserves the right to send questionnaires relating to the Sustainability Requirements of Suppliers and to establish a rating system that may have an impact on the awarding process.

3.4 Protection of the Context and stakeholders

Protection of workers:

ART SPA and its suppliers shall comply with the regulations and standards in force in the countries where they operate, concerning the protection of workers.
All Recipients of relationships with ART Spa must be informed of the existence of the Code and the related provisions, committing themselves to their implementation.
If local regulations are less stringent than the principles set out in this document, the latter shall undertake to adopt, within a reasonable period of time, the measures necessary to comply with these principles. The adoption of certified HSE and ESG management systems (e.g. ISO 45001, SA8000, ISO 14001, etc.) is considered positively.
To protect workers regarding specific risks, they will provide specific training and define the monitoring phases necessary to implement.

In the case of Chemical / Biological Risk (where present), they will provide information to the people involved on how to handle chemical and biological substances in order to avoid damage to health, in addition to their census (including substances that cause diseases) to reduce their exposure in accordance with national laws, industrial requirements and international standards.

The adoption of training programs on HSE and ESG issues, such as, but not limited to, the protection of human rights and the fight against child or forced labour, the fight for social responsibility and inclusion (DEI) as well as the prevention of discrimination and harassment, is all viewed positively.

As part of the promotion of a culture of child protection, suppliers shall also support the dissemination of this culture in their supply chain.

ART SPA and its suppliers shall therefore undertake not to use child labour, not to use any form of forced labour and to oppose any form of human trafficking. Suppliers who use coercive labour methods or who use or support such practices will be excluded from the supplier list.

ART SPA promotes and recommends the protection of the freedom of association of workers employed by suppliers. All suppliers must therefore commit to guaranteeing freedom of association and negotiation for workers and non-discrimination for workers' representatives.

Compliance with national labour agreements is required with regard to the remuneration/wages and benefits to be paid to workers, insurance and social security obligations. Remuneration must in any case not be lower than that indicated by the local laws in force and by the labour contracts for the category and in any case must meet the basic needs of the workers.

ART and its suppliers must comply with the applicable rules on the regulation of working hour. They are also required to grant all benefits provided by law, including but not limited to social security, parental leave, annual leave and holidays.

Fair competition

ART SPA does not enter into commercial agreements that distort, eliminate or discourage competition, or that offer unfair competitive advantages. It promotes fair and sustainable competition among its suppliers based on clear and transparent awarding procedures in application of the Community principles (transparency, nondiscrimination, free competition). Suppliers are obliged not to behave in a manner contrary to the principles of fair competition and to comply with all applicable antitrust laws.

Counterfeit Parts

The Company and its suppliers must commit to developing, implementing and maintaining methods and processes appropriate to their products/services to minimize the risk of introducing counterfeit parts and materials into deliverable products and to intercept their possible presence in their products sold.
If identified, they must be made unavailable (quarantine), subsequently information must be given to your customer (up to the OEM, if applicable) and/or law enforcement agencies as appropriate.

Intellectual and Industrial Property

The company and its suppliers must undertake to respect and guarantee the intellectual property protected by patents, copyrights and registered trademarks, both their own and that of third parties.
Protection of the Company's intellectual property is essential to maintaining the company's competitive advantage.
All those who operate on behalf of the company, within the scope of their functions and responsibilities, are required to safeguard and manage the industrial intellectual property of the company by safeguarding in an adequate manner and in compliance with internal procedures, everything that constitutes corporate know-how and /or are the subject of intellectual or industrial property rights.

To be considered Intellectual Property, but not only: patents, industrial secrets, trademarks, distinctive signs, technical and scientific knowledge, know-how and skills acquired during company activities, inventions, literary and artistic works, drawings, symbols, names/ nomenclatures and images usable for commerce.

Export Controls & Economic Sanctions

The company and its suppliers must comply with all applicable export control laws regarding export, re-export, software, services and technology restrictions applicable to trade with certain countries, regions, companies or individual entities.

All Company personnel are required to observe these laws.

Environmental protection:

ART and its suppliers must strive to minimise the environmental impact of their operations and the entire life cycle of their products and services through the efficient use of natural resources (as a water consumption) and energy efficiency, preference for renewable energy sources, proper waste disposal, reduction of greenhouse gas emissions (GHG) and mitigation of impacts on biodiversity and ecosystems.

ART Spa is determined to contribute to achieving the objective of reducing CO2 emissions and other applicable sustainable development objectives, as established by the United Nations 2030 Agenda, in the awareness that companies have a decisive role in the fight against change climate.
The decarbonisation in question refers to the reduction of greenhouse gas emissions from a company's value chain, starting from raising the awareness of all ART collaborators to commit to reducing carbon dioxide emissions in the area of competence and influence, also through the reduction of the project's absolute carbon emissions, through optimization throughout the project life cycle.
The reduction of CO2 emissions must also take place through the reduction of travel, business trips and company transport, facilitating car-sharing, and the use of hybrid or electric vehicles.
The adoption of certified environmental management systems is considered positive (eg: EMAS, ISO 14001..etc..) also for the energy management (eg: ISO 51000).

ART and its suppliers shall comply with applicable environmental regulations and requirements including but not limited to: obtaining and maintaining environmental permits and approvals to conduct regulated activities; handling and disposal of hazardous materials; chemical risk in general; emissions of contaminants impacting to air, water and soil quality; protection of natural resources and wildlife; prohibition or restriction on the use of specific substances; recycling of materials; and respect for environmental rights.

Negative impacts on the climate and the environment are to be minimised through the modification of production, processing and maintenance processes, through material substitution, conservation, recycling and reuse of materials. The use of hazardous substances by Suppliers must comply with legal requirements. Substances that are subject

to national and international bans because they are harmful to people or the environment shall be prohibited, and appropriate measures shall be taken for the handling, storage and transport of hazardous substances.

Resource conservation and climate protection

The company and its Suppliers must be equipped with tools for the prevention and reduction-mitigation of the impacts that their activities may have on the climate, whether direct or indirect (e.g. any losses and accidental spills into the environment, decarbonisation..etc ..). Furthermore, they undertake to promote responsible behaviour and practices in order to reduce the direct and indirect impacts connected to their business activities, through the search for solutions that allow us to reduce, as far as possible, air pollution, water, the waste of natural resources (water, plants, etc.), energy, pollution and unavailability of soil and noise pollution (noise emissions such as transport, industrial and normal daily activities).

To achieve this goal, they will have to,
- Renewable energy: where possible, prefer the production (or supply) of energy from non-exhaustible natural resources, which include wind, solar and geothermal energy; - Use of resources: where possible, implement systems for the sustainable management of resources in order to reduce their use;
- Protection of Biodiversity: with reference to the maintenance of ecosystems, to preserve flora and fauna and to avoid irreparable damage to natural habitats, the Company and its suppliers will promote a 'deforestation-free' supply chain;
- Animal welfare: ensuring that animals affected by your actions are healthy and in a good state of well-being, comfortable, well-nourished, safe, able to express innate behaviors and free from unnecessary pain, fear or distress.

Waste management

ART SPA and its suppliers must have sustainable systems in place to ensure the safe handling, movement, storage, the management of waste, emissions (atmospheric, waste water, solid waste), as well as taking place in a safe way, it takes place by favoring reduction, reuse and recycling as methods to reduce their environmental impact.

3.5 Dealings with Public Officials

Public officials are defined as: bodies, representatives, agents, members, employees, consultants, persons in charge of public functions or services, of public institutions, public administrations, public bodies at international, state or local level.

The management of negotiations, the entering into commitments and the carrying out of dealings of any kind with public officials must comply with the following principles of conduct:

- It is not permitted to promise or pay money or gifts to managers, officials or employees of the Public Administration or their relatives, whether Italian or from other

countries, even as a result of unlawful pressure, unless they are gifts or utilities of modest value.

- It is not permitted to offer or accept any object, service or favour of value in order to obtain more favourable treatment in relation to any relationship with the Public Administration.

- When conducting a tender with the public administration, it is not permitted to try to improperly influence the decisions of public officials, and one must act in accordance with the law and correct business practice.

- During a business negotiation, request or commercial relationship with the Public Administration, it is not permitted to propose employment and/or commercial opportunities that may benefit Public Administration employees, even in a personal capacity. It is also not permitted to solicit or obtain confidential information that could compromise the integrity or reputation of either party.

3.6 Dealings with representatives of political forces and interest groups

Representatives of political forces are individuals who hold institutional positions or offices within political parties or movements.

Representatives of interest groups are individuals who hold institutional positions or offices within organisations such as trade associations, trade unions, etc., and who have been elected by the political parties or movements.

In relations with such categories of persons, it is forbidden to promise or pay sums, promise or grant, on a personal basis, goods in kind or other benefits, even following unlawful pressures, to promote the interest of ART SPA, except in the case of gifts or utilities of modest value.

It is also forbidden to circumvent the aforesaid prescriptions by resorting to different forms of aid or contributions that, under the guise of sponsorships, consultancies, assignments, etc., have the same purposes as those forbidden above.

Strictly institutional forms of collaboration are possible, aimed at contributing to the organisation of events, studies, research, conventions and seminars, etc.

4 Compliance with the Code of Ethics

4.1 Obligation to report breaches and grievance mechanism (Whistleblowing)

Compliance with the rules of the Code of Ethics is an essential part of the contractual obligations of employees in accordance with Articles 2104 and 2106 of the Civil Code.

Collaboration contracts include the obligation to comply with this Code.
Each employee/collaborator/supplier/stakeholders is required to be familiar with the provisions contained in the Code and with the relevant legal regulations governing the activity carried out within the scope of his/her function.
The aforementioned are obliged to:

a) comply with the Code and refrain from conduct contrary to its provisions and rules;
b) comply with the guidelines set out in the EMS (Enterprise Management System) documentation;
c) in the event of any doubt, to refer to his/her direct superiors or direct contact for the necessary clarifications on how to apply the Code or the reference regulations;
d) promptly report any information regarding possible violations of the Code to their direct superiors or designated contacts, unless the irregularities detected involve the office holder himself; in this case, the information must be reported to persons superior to the "direct supervisor" involved (Personnel Department);
e) cooperate with the Company in investigations aimed at verifying and, if necessary, sanctioning possible violations.

Employees are not authorized to conduct investigations into alleged illegal conduct themselves and are required to report any information they have regarding such conduct only to their superiors.

"Immediate superior" means the person who is formally superior in the hierarchy, responsible as the person in charge or otherwise authorized to supervise and/or control all activity.

The Recipients of the provisions contained in this Code are required to report to their direct superiors any behavior that is, even potentially, in conflict with the provisions of this Code. No one will be subject to reprisals for reporting a well-founded suspicion of a violation of these rules.
If, in the course of business activities, doubts arise as to the compliance of a type of conduct with this Code, or with other ethical and behavioral policies adopted by the Company, the Recipients are required to contact their superior. Everyone is individually responsible for the application of these rules and no one is required to "apply them alone."

All persons subject to this Code of Ethics may report any violation or suspected violation of the Code of Professional Conduct: the appropriate Supervisory Body (ODV), while guaranteeing the anonymity of the person who made the report, together with the Company Management, will assess on a case-by-case basis whether to initiate an investigation in light of the specific circumstances.
The confidentiality of the reporting person is guaranteed, without prejudice to legal obligations.

All violations will be investigated immediately and treated with the utmost confidentiality; in particular, with regard to employees, investigations will be conducted in accordance with the provisions of the law and collective bargaining agreements on disciplinary proceedings. The whistleblower, or their representative, will be consulted during the resolution and remedy phase of the report.

The person who reported the violation is prohibited from conducting preliminary investigations on their own. Investigations into alleged violations can involve complex legal issues; acting on one's own initiative can therefore compromise the authenticity of the investigation and have negative consequences for the employee and the Company.

All reports relating to possible violations of this Code, or refusal to apply it or other policies adopted by the Company relating to ethical conduct, must be communicated to one's immediate superiors.

- Violation of the provisions of the Code of Ethics by employees (employees and collaborators) constitutes a breach of contractual obligations and may result, depending on the case, in:
- the application of sanctions and disciplinary measures provided for in the applicable Collective Agreements;
- termination of employment;
- the application of penalties;
- compensation for damages.

A specific appeal procedure is guaranteed.

ART provides the Organization's stakeholders (both internal and external) with a specific procedure and IT platform for reporting irregularities, illegal acts and conduct that does not comply with this Code. This platform can be accessed via a specific link on the website, where confidentiality is assured and guaranteed (without prejudice to legal obligations).

Francesco Ortix,

Amministratore Delegato,

29.10.2025