



CODE OF ETHICS

CODE OF ETHICS

Rev.3 del
21/06/2024

Pag. 1 di 9



DEFREMM S.p.A.
CODE OF ETHIC



CODE OF ETHICS

CODE OF ETHICS

Rev.3 del
21/06/2024

Pag. 2 di 9

INDEX

1. THE COMPANY AND THE CODE OF ETHICS.....	3
1.1 VALUES.....	3
1.2 RECIPIENTS.....	4
2. FUNDAMENTAL PRINCIPLES.....	4
2.1 COMPLIANCE WITH THE LAW.....	4
2.2 DIGNITY, EQUALITY, INTEGRITY.....	5
2.3 PROFESSIONAL DILIGENCE AND SPIRIT OF COOPERATION	5
2.4 CONFLICT OF INTEREST... ..	6
2.5 COMPETITION.....	6
3. IMPLEMENTATION RULES OF THE CODE OF ETHICS.....	7
3.1 ADOPTION AND DISSEMINATION.....	7
3.2 THE SUPERVISORY BODY.....	7
3.3 REPORTING.....	7
*Reference to Annex1 of the Code of Ethics.....	8

1 THE COMPANY AND THE CODE OF ETHICS

	<h1>CODE OF ETHICS</h1>	CODE OF ETHICS	
		Rev.3 del 21/06/2024	Pag. 3 di 9

DEFREMM S.p.A. (hereinafter also referred to as “DEFREMM”, “ENTITY”, “COMPANY”) DEFREMM S.p.A. (hereinafter also referred to as “DEFREMM”, “ENTITY”, “COMPANY”) is an industrial manufacturing company specializing in cold forming from steel wire, aluminum alloys, copper, brass, and stainless steel. It is certified IATF 16949:2016 and a leader in digital transformation.

DEFREMM produces custom-designed special parts for multiple industries, including Automotive, and standard fasteners such as blind rivets and threaded tubular inserts.

This document defines a set of principles that are particularly significant within DEFREMM based on its history, identity, leadership, and current management.

The code aims to identify shared values, principles, and duties that all those who work for the Company must strive for and adhere to. The formulation of this value system is accompanied by ethical standards of behavior that must be applied, without exception, by all Recipients, as identified below.

The Company is committed to promoting awareness of its value system among its recipients and providing every possible tool to ensure its full and effective application.

1.1 The Values

The code of ethics at DEFREMM is the most important corporate document and serves as the fundamental charter of principles regulating the company's behavior towards employees, customers, suppliers, stakeholders in general, and the social environment in which DEFREMM operates.

It governs every corporate action, strategy, and behavior, positioning the company as a social entity operating within a geographical and socio-cultural context.

The code of ethics thus oversees and permeates all regulations, including quality systems, management systems, sector-specific standards like IATF, gender equality standards UNIPDR 125:2022, and compliance with Italian regulations on safety (81/08), the environment, and Legislative Decree 231/01.

The model is intended to be participatory: the principles included in the code express the involvement of workers, prioritizing the definition of shared behavioral models and rules within the company.

Therefore, the code will be shared, and after this process, it may also be supplemented with values that emerge from discussion.

For DEFREMM, striving to be the best means being the best (i) for the women and men who work in the company every day and for years, empowering them through their competence, responsibility, involvement, and passion; (ii) for its customers, ensuring they receive quality products through constructive and constant dialogue; (iii) for suppliers, who are active players in the value chain and partners in the growth of people and territories; (iv) for the territory, promoting moral, social, and environmental wealth toward a sustainable future; (v) for shareholders, aiming at creating a value that transcends individuals and shares, eventually becoming a common good, transferable and widespread.

	<h1>CODE OF ETHICS</h1>	CODE OF ETHICS	
		Rev.3 del 21/06/2024	Pag. 4 di 9

It promotes education by encouraging and supporting its employees or collaborators to grow individually, thereby increasing the company's overall value and its relationships.

It fosters communication by recognizing continuous and constant dialogue, and respect for roles and competencies, as ways to enhance the sense of well-being and belonging.

It ensures respect for personal privacy and data protection and discourages any tendency or risk of disclosing information that could harm the individual or the entity. DEFREMM guarantees and respects the private sphere of everyone, promotes personal self-determination, and respects individual tendencies and choices.

It always strives for product excellence. Customer satisfaction creates a bond of trust and value with the business partner, fostering the growth of technical collaborations, partnerships, and the development of innovative projects that could not exist without the drive to excel and the bond of trust.

DEFREMM implements a policy of continuous improvement of the company, its environments, structures, tools, and equipment through targeted and sustainable investments with proper planning and organization.

1.2. The Recipients

DEFREMM S.p.A. has adopted this Code to formalize the fundamental ethical values that inspire it and to which the Administrators, members of the Board of Statutory Auditors, Managers, Employees, collaborators, consultants, suppliers, and, in general, all those who operate with and for the Company on the basis of a contractual relationship, even if temporary, must adhere to in performing the tasks and functions entrusted to them.

This document applies to all activities carried out in the name of and on behalf of the Entity, both in Italy and abroad, while taking into account the cultural, social, and economic diversity of the various countries in which the Company operates.

Respect for the principles stated in the Code is primarily a moral duty for the Recipients, who are required to have full awareness that it serves the purpose of pursuing business objectives in line with the fundamental values indicated in the preamble.

Compliance with the provisions of the Code of Ethics is an integral part of the contractual obligations of Employees, as per and for the purposes of Articles 2104 and 2105 of the Italian Civil Code, while violations by the Recipients may, depending on the case, constitute disciplinary offenses (sanctionable in accordance with applicable laws and as provided for by this Code) and/or contractual breaches and may result in compensation for any damage caused to the Company by such violations.

The Entity requires collaborators, consultants, and suppliers to adhere to the fundamental ethical principles on which this Code is based, including through specific contractual clauses.

2 FUNDAMENTAL PRINCIPLES

	<h1>CODE OF ETHICS</h1>	CODE OF ETHICS	
		Rev.3 del 21/06/2024	Pag. 5 di 9

2.1 Respect for Laws and Regulations

The code of ethics enhances the legislative context by identifying a set of objectives and protections beyond those established by international, European, Italian, and regional laws.

The Company considers compliance with applicable laws, regulations, and legislation an indispensable prerequisite for achieving its economic, production, and social objectives and for consolidating its ethical business principles.

DEFREMM is also committed to respecting the highest international standards, voluntarily adopted norms such as those related to quality, the environment, and safety, specific industry standards for automotive (IATF 16949:2016), the protection of human rights, and gender equality (UNIPDR 125:2022), internal regulations, welfare provisions, and all internal directives.

The company encourages the sharing of values so that, once they become common heritage, they can form the basis for an increasingly better business, social, and production reputation, benefiting not only the company but also individual stakeholders.

Everyone contributes to and influences the final result.

The entity is committed to ensuring compliance with international, community, national, and regional laws, regulations, and commonly accepted ethical principles in business conduct, both internally and in external relations.

Recipients, in carrying out their functions and activities, must:

- Observe and comply with the laws of the legal system in which they operate;
- Respect the norms conventionally and voluntarily adopted;
- Comply with internal regulations and operational directives;
- Refrain from violating laws and regulations;

Diligently acquire the necessary knowledge of applicable legal and regulatory provisions relevant to their duties, as they evolve over time, and align their behavior with them.

Behaviors contrary to these precepts are not tolerated, and a lack of adequate knowledge of them is not justified.

2.2 Dignity, Equality, and Integrity

The Recipients of this Code must recognize and respect the personal dignity, privacy, and personality rights of every individual.

	CODE OF ETHICS	CODE OF ETHICS	
		Rev.3 del 21/06/2024	Pag. 6 di 9

In carrying out their duties, Recipients should behave transparently and with moral integrity, considering the various social, economic, political, and cultural contexts they operate in. Particularly, they must adhere to the values of honesty, equality, fairness, good faith, solidarity, inclusion, gender respect, empowerment, responsibility, self-correction, and positive influence.

Recipients work with colleagues of any origin, nationality, culture, religion, race, and social class without discrimination, aiming to enhance individual qualities. The Entity guarantees and promotes gender equality in a stimulating environment focused on individual growth: no discrimination of any kind is tolerated, regardless of the source.

2.3 Professional Diligence and Spirit of Collaboration

Each Recipient's behavior significantly affects the quality, efficiency, and reputation of the Company's organization.

Every Recipient performs their duties with the professionalism required by the nature of the tasks and functions they carry out, putting in maximum effort and diligently performing the necessary activities for deepening and updating their knowledge. They must acquire the required understanding of applicable legal and regulatory norms, relevant to their duties, and as they evolve over time.

Collaborators and employees wishing to work with or for the entity must behave according to nourishing moral and ethical principles, actively contribute to improving the company and the society they live in, create healthy relationships, and promote knowledge, solidarity, and collaboration among people.

DEFREMM aspires to improve the environment in which it operates, whether in terms of territory, context, or social relations.

2.4 Conflict of Interest

Recipients, in carrying out their functions, must avoid situations that could generate conflicts of interest, even potential ones, or that could interfere with their ability to make impartial decisions. Among others, the following situations are considered conflicts:

- Participation (overt or covert) in competing activities;
- Exploiting one's functional position to pursue interests in conflict with those of the Company or for personal gain;
- Using information acquired in the course of work for personal or third-party gain, and in conflict with the Company's interests;
- Accepting money, favors, or benefits from individuals or companies that have or intend to enter into business relationships with the Company;
- Holding corporate positions or carrying out any type of work at suppliers, competitors, or third parties that conflict with the Company's interests.

Any situation that could potentially generate a conflict of interest or impair the Recipient's

	<h1>CODE OF ETHICS</h1>	CODE OF ETHICS	
		Rev.3 del 21/06/2024	Pag. 7 di 9

ability to make decisions in the Company's best interest must be immediately communicated to the Supervisory Body and obligates the Recipient to refrain from performing related acts.

2.5 Competition

The Entity complies with and applies the competition laws and regulations in force in the European Union and the countries in which it operates, ensuring compliance with competition principles and full transparency in its actions. All restrictive agreements on competition, or any other form of intentional coordination aimed at preventing, restricting, or distorting competition, as well as the adoption of commercial strategies that result in abuse of its position, defined as the economic condition enabling the Company to operate with actual market dominance and hinder free competition, are prohibited. The Recipients also commit to not obstructing Authorities during inspections, maintaining a conduct based on maximum collaboration, and providing clear, transparent, and truthful information.

3 IMPLEMENTATION RULES OF THE CODE OF ETHICS

3.1 Adoption and dissemination

This Code and any future updates are defined and approved by the Company's Governing Body.

The Code is distributed, including electronically, to all resources through specific communication from the Governing Body. A copy of the Code is published on DEFREMM S.p.A.'s website (www.defremm.it).

The Code is provided to new hires to ensure they have knowledge of key information deemed essential. Consultants, suppliers, sub-suppliers, partners, and anyone performing activities for the Company are informed of the publication of this Code of Ethics on the company website or, where applicable, provided with a printed copy, even for consultation purposes only.

The Code is subject to revision by the Company's Governing Body (with the indication of rev_date).

Any changes to the Code introduced as a result of such review activities are published and made available through the same methods of dissemination mentioned above.

This Code comes into effect from the date of its approval by the Board of Directors in office at the time.

3.2 Supervisory Body

The task of overseeing the functioning and compliance with this Code is entrusted to the Supervisory Body (also "OdV"), equipped with independent powers of initiative and control, appointed by the Company's Governing Body in accordance with Legislative Decree 231/01. At the Board of Directors' sole discretion, the OdV may be appointed as a single-member or a collegial body. Without prejudice to the protections provided by applicable laws or collective agreements and subject to legal obligations, the OdV is authorized to receive requests for clarification, as well as reports of potential or actual violations of this Code.

	CODE OF ETHICS	CODE OF ETHICS	
		Rev.3 del 21/06/2024	Pag. 8 di 9

The OdV is bound to strict confidentiality and operates with impartiality, authority, continuity, professionalism, and autonomy. The OdV must be provided with a budget, ensuring decision-making and spending autonomy regarding its financial resources.

The Supervisory Body operates with broad discretion and full support from the Company's leadership, with which it collaborates in absolute independence.

3.3 Reporting

To ensure the effectiveness of this Code, the Company provides communication channels through which anyone who becomes aware of potential unlawful behavior within the Company can report such behavior freely, directly, and with complete confidentiality to the Supervisory Body.

It is the obligation of every individual to report to the Body without delay any violation or suspicion of violation of the principles of the Code of Ethics committed by any Recipient.

Any violation of the principles and provisions contained in this Code of Ethics by the Recipients must be promptly reported to the Company's Supervisory Body through the communication channels identified in the Company's Organizational Model.

Following the reports received, the OdV will conduct the necessary investigations, and if specific responsibilities are confirmed, it will inform the corporate bodies responsible for imposing disciplinary sanctions.

All reports received by the OdV are managed with absolute confidentiality. Failure to maintain confidentiality could result in the revocation of the mandate of the OdV members and financial liability, as well as the possibility of seeking compensation for damages caused, including those resulting from mismanagement under GDPR Regulation EU 679/16.

The OdV acts to protect whistleblowers from any form of retaliation, discrimination, penalization, or any consequence resulting from their report, ensuring confidentiality regarding their identity, except for legal obligations and the protection of the rights of the Company or individuals falsely or maliciously accused.

The Company provides employees the ability to report abuse or harassment through an anonymous reporting system to the Gender Equality Committee. Once a report is received, the Committee will involve the OdV in managing the case.

In accordance with the legislative provisions set out in Article 6, paragraph 2 bis, of Legislative Decree 231/01, the Company or its governing bodies are prohibited from engaging in any retaliatory or discriminatory acts, directly or indirectly, against the whistleblower for reasons directly or indirectly related to the report.



CODE OF ETHICS

CODE OF ETHICS

Rev.3 del
21/06/2024

Pag. 9 di 9

* An integral part of this Code of Ethics is Annex no.1.



Annex 1

CODE OF ETHICS

Rev.1 del
21/06/2024

Pag. 1 di 11



DEFREMM S.p.A.

(ai sensi del Decreto Legislativo n.231/01)

Annex 1 to the Code of Ethics Principles Useful under D.Lgs.231/01

INDEX

1.1	COMBATING CORRUPTION.....	3
1.2	COMBATING MONEY LAUNDERING, RECIPIENTS, AND SELF-LAUNDERING.....	3



Annex 1

CODE OF ETHICS


Rev.1 del
21/06/2024

Pag. 2 di 11

1.3	COMBATING ORGANIZED CRIME OFFENSES.....	4
2.	INTERNAL RELATIONS	4
2.1	STAFF SELECTION AND MANAGEMENT.....	4
2.2	HARASSMENT IN THE WORKPLACE.....	5
2.3	PROTECTION OF COMPANY ASSETS.....	5
3.	MANAGEMENT OF EXTERNAL RELATIONS.....	6
3.1	RELATIONS WITH PUBLIC ADMINISTRATION AND SUPERVISORY AUTHORITIES.....	6
3.2	RELATIONS WITH POLITICAL PARTIES AND TRADE UNIONS.....	7
3.3	RELATIONS WITH SUPPLIERS.....	7
3.4	RELATIONS WITH CUSTOMERS	8
3.5	GIFTS, BENEFITS, AND OTHER UTILITIES.....	8
4.	ACCOUNTING DATA.....	9
4.1	GENERAL PRINCIPLES.....	9
4.2	TRACEABILITY	9
5.	HEALTH AND SAFETY IN THE WORKPLACE	10
6.	ENVIRONMENTAL PROTECTION.....	11
7.	DISCIPLINARY MEASURES.....	12

Allegato 1 al CODICE ETICO

PRINCIPLES PURSUANT TO D.LGS. 231/01

	Annex 1	CODE OF ETHICS	
		Rev.1 del 21/06/2024	Pag. 3 di 11

1.1 Combating Corruption

DEFREMM S.p.A. considers respect for principles such as loyalty, fairness, transparency, honesty, integrity, as well as laws, technical and organizational regulations, international standards, and guidelines—both domestic and foreign—as fundamental factors for the development of its business in matters of anti-corruption.

Any practice and form of corruption, whether active or passive, is strictly condemned. Therefore, it is prohibited to initiate or continue any relationship with those who do not intend to adhere to these principles.


The company does not tolerate the granting of benefits, privileges, or payments that could be interpreted as acts of corruption; courtesy gestures are only allowed if permitted by regulations, provided they are of modest value or in any case do not compromise the integrity or reputation of any party and cannot be interpreted as acts aimed at improperly gaining advantages.

1.2 Combating the Crimes of Receiving Stolen Goods, Money Laundering, and Self-Laundering

The Entity conducts its business in full compliance with current legislation on receiving stolen goods, money laundering, and self-laundering, as well as the provisions issued by competent authorities, committing itself to avoid engaging in suspicious transactions from the standpoint of fairness and transparency.

In particular, the Company commits to:

- Verify in advance the available information about business counterparts, suppliers, business partners, collaborators, and consultants, to ensure their respectability and the legitimacy of their activities before establishing business relationships with them;
- Not accept payments in cash, bearer securities, or through unauthorized intermediaries or third parties in a way that makes it impossible to identify the entity providing the funds;
- Avoid engaging in transactions that hinder the traceability of financial flows;
- Refrain from any involvement in operations that could, even potentially, facilitate money laundering from illegal or criminal activities, fully complying with anti-money laundering regulations and internal control systems.

	Annex 1	CODE OF ETHICS	
		Rev.1 del 21/06/2024	Pag. 4 di 11

If there is evidence of transactions arising from illicit activities or activities that could constitute a crime, subject to appropriate reporting to the competent Control Bodies, the Recipients are required to refrain from employing, replacing, or transferring into economic, financial, entrepreneurial, or speculative activities the money, goods, or other assets derived from the commission of such crimes.

1.3 Combating Organized Crime Offenses

DEFREMM undertakes to establish relationships of any kind exclusively with properly accredited and verified counterparts.

Each Recipient must abstain from engaging in any type of relationship, even indirectly or through intermediaries, with individuals (both natural or legal persons) who are known or suspected to be involved with or support organized crime in any form, including mafia-type organizations, those engaged in money laundering from criminal activities, human trafficking, or exploitation of child labor, waste trafficking, as well as individuals or groups that operate for terrorist purposes.

2 I INTERNAL RELATIONS


2.1 Personnel Selection and Management

The Entity is committed to creating and maintaining the necessary conditions for the skills, competencies, and knowledge of each employee to further expand, ensuring the effective achievement of the Company's and personal goals.

Recipients must explicitly and consistently respect the dignity and values of individuals, avoiding any discrimination based on origin, gender, sex, racial or ethnic background, nationality, age, political opinions, religious beliefs, health status, sexual orientation, and socio-economic conditions.

In compliance with the International Labour Organization Conventions, the Company commits to respecting fundamental human rights, preventing abusive activities, and refraining from using any form of forced labor or work performed under conditions of slavery or servitude, following international, European, and national regulations.

In the selection process—carried out in compliance with the principles of this Code of Ethics, equal opportunity, gender equality, and non-discrimination—the Company ensures that acquired resources match the actual profiles needed, avoiding favoritism and selecting based on established objective criteria.

	Annex 1	CODE OF ETHICS	
		Rev.1 del 21/06/2024	Pag. 5 di 11

No form of irregular employment is tolerated: all Company personnel are hired under a regular employment contract, with full respect for the applicable sector's collective labor agreements, tax, social security, and insurance laws, as well as immigration regulations.

2.2 Workplace Harassment

No form of work relationship that leads to harassment or behaviors related to mobbing or bullying is tolerated. This includes, but is not limited to:

- Creating an intimidating, hostile, or discriminatory work environment for employees (by employers or colleagues);
- Obstructing others' career prospects for mere personal or competitive reasons;
- Subordinating decisions important to the employee's work life to the acceptance of sexual favors, sexual diversity, or social, personal, or cultural differences;
- Coercing subordinates into sexual favors by abusing one's position;
- Alluding to disabilities, physical or mental impairments, or cultural, religious, or sexual orientation differences.

2.3 Protection of Corporate Assets

Company assets, equipment, and facilities are used for work-related purposes, as per the applicable regulations unless otherwise stated.

Each employee is personally responsible for the tools assigned to them, even if only temporarily, as well as for their proper use and integrity. They are directly accountable if such assets are used, intentionally or unintentionally, by third parties.

It is strictly forbidden to use company assets and IT resources for personal purposes, or for purposes contrary to legal norms, public order, or decency, and especially to commit or induce others to commit crimes.

It is also forbidden to engage in conduct that may damage, alter, deteriorate, or destroy IT systems, programs, or data belonging to the Company or third parties.

No Recipient is allowed to make recordings or reproductions of documents, assets, or equipment belonging to the Company unless such activities are part of their assigned tasks.

	Annex 1	CODE OF ETHICS	
		Rev.1 del 21/06/2024	Pag. 6 di 11

Regarding IT resources, it is prohibited to illegally duplicate programs installed on computers or to use company resources for consulting, storing, distributing, or engaging in activities involving materials without usage rights (e.g., unlicensed software, unauthorized movie viewing), or content involving child pornography or terrorism.

3 EXTERNAL RELATIONS

3.1 Relations with Public Administration and Supervisory Authorities

Relations with Public Administration and Supervisory Authorities are based on principles of fairness, truthfulness, transparency, efficiency, and cooperation.

The approach to the Public Administration is that of a user seeking a service, respecting the necessary separation and independence. With public entities, DEFREMM aims to create widespread value of efficiency and well-being for the development of the territory and its external relations.

Relations with the Public Administration can only be maintained in the name and on behalf of the Company by specifically authorized functions and resources.

During inspection activities, Recipients are committed to providing the Public Administration and Supervisory Authorities with full cooperation, promptly offering clear and truthful information. In such instances, the Company will ensure timely notification of the Supervisory Body and the relevant professional so they can intervene during the inspection to safeguard the Entity's rights.

3.2 Relations with Political Parties and Trade Unions

Relations with political parties, trade unions, and other interest groups are conducted in compliance with the provisions of this Code, with particular attention to the principles of impartiality and independence.

Forms of strictly institutional collaboration aimed at contributing to the organization of events or activities, such as conferences, seminars, studies, research, etc., are permitted, provided they are not intended to obtain undue favors and without any consideration.

3.3 Relations with Suppliers

	Annex 1	CODE OF ETHICS	
		Rev.1 del 21/06/2024	Pag. 7 di 11

Suppliers are those who provide goods, services, performances, and resources necessary for DEFREMM to carry out its activities and products, contributing to the achievement of the company's goals.

The selection, maintenance, and relationships with them are crucial for achieving social objectives and respecting value principles; therefore, all of them are required to share this ethical code.

The selection of suppliers of goods or services and, in any case, the purchase of goods and services of any kind are carried out based on objective and documentable criteria, aimed at finding the best balance between economic advantage and quality of performance. In relations with suppliers, the Company is guided by the principles of transparency, equality, loyalty, and free competition.


In particular, in these relations, the Recipients are required to:

- Establish efficient, transparent, and collaborative relationships, maintaining open and frank dialogue in line with the best commercial practices;
- Verify in advance the available information about suppliers to ascertain their respectability and the legitimacy of their activities, including through opinions from already known parties or representatives of categories, professional bodies, banks, or public databases;
- Obtain the cooperation of suppliers in ensuring the most advantageous/useful relationship between quality, cost, and delivery times;
- Enforce the application of contractually stipulated conditions;
- Require suppliers to adhere to the principles of this Ethical Code and include appropriate provisions in contracts;
- Operate within the framework of applicable regulations and require strict compliance with them.

3.4 Relations with Customers

DEFREMM is guided by the principles of transparency, equality, loyalty, and free competition and ensures fairness and clarity in commercial negotiations and the assumption of contractual obligations, as well as diligent fulfillment.

DEFREMM shapes its relationship with customers according to principles of punctuality, respect for agreements made, collaboration, mutual growth, availability, flexibility, and transparent and timely dialogue. DEFREMM aims to simplify procedures and processes within a framework of well-established ethical, legal, and technical standards.

	Annex 1	CODE OF ETHICS	
		Rev.1 del 21/06/2024	Pag. 8 di 11

In initiating commercial relations with new customers and managing existing ones, the Recipients must avoid engaging in relations with parties involved in illegal activities or lacking the necessary ethical and commercial reliability requirements, as well as maintaining financial and commercial relations with parties that, even indirectly, hinder human development and contribute to violating fundamental human rights.

3.5 Gifts, Benefits, and Other Utilities

The Entity does not tolerate the granting of benefits to third parties, defined as a form of corruption, by the Recipients of this Code; it is prohibited to offer, grant, promise, or provide to third parties, as well as to accept or receive from third parties, directly or indirectly, even on festive occasions, gifts, benefits, goods, services, or other utilities, including in the form of sums of money, that exceed normal courtesy relations.

Recipients are also prohibited from soliciting offers or grants or from accepting or receiving gifts of any kind, even of modest value.

4 IACCOUNTING DATA

4.1 General Principles

Accounting records are maintained according to principles of transparency, truthfulness, completeness, clarity, precision, accuracy, and compliance with current regulations.

The Entity imposes compliance with all applicable regulations, particularly those related to the preparation of financial statements and any type of mandatory administrative-accounting documentation.

Accounting is based on generally accepted accounting principles and systematically records the events arising from the Company's management.

It is prohibited to engage in behaviors that prevent or hinder, through the concealment of documents or the use of other fraudulent means, the regular conduct of the activities of corporate bodies, auditors, and shareholders, cooperating, when requested, in the fulfillment of any form of control and auditing of corporate management, as provided by law.

4.2 Traceability

	Annex 1	CODE OF ETHICS	
		Rev.1 del 21/06/2024	Pag. 9 di 11

Adequate documentation—whether digital or otherwise—must be retained to support every transaction, allowing for easy reconstruction of the transaction, accounting registration, identification of any responsibilities, and attribution to a specific individual.

This documentation must identify the reason for the transaction that generated the recording and its related authorization. Supporting documentation must be easily retrievable and archived in compliance with deadlines stipulated by relevant regulations, according to appropriate criteria that allow for easy consultation by both internal and external entities authorized for control.

5 HEALTH AND SAFETY IN THE WORKPLACE

DEFREMM considers health and safety at work to be an active and preventive practice that begins with the creation of a shared value system, taking care of the person and individual specificity, in the growth of the resource, and in compliance with ethical, technical, and legal rules. Only the construction of a collaborative corporate system can profoundly impact health and safety in the workplace.

The Company carries out its activities under technical, organizational, and economic conditions that ensure adequate prevention and a healthy and safe working environment, and guarantees a work environment compliant with current safety and health regulations, including through monitoring, management, and prevention of risks associated with professional activities.

DEFREMM promotes employee participation in the risk prevention process and in protecting the health and safety of themselves, colleagues, and third parties; Workers are required to properly use machines, personal protective equipment, and safety devices.

It is noted that the Entity, in relation to its typical activity, is a production company with intense rhythms and high risks regarding health and safety. The objectives, principles, and fundamental criteria for prevention in matters of health and safety at work are as follows:

- Respect people, tasks, competencies, ethical rules, technical rules, and legal norms;
- Know and comply with current legislation on health and safety in the workplace;
- Prevent accidents and occupational diseases and have all necessary Risk Assessment Documents related to the type of reality, activities, and environment pertaining to the Entity;
- Respect ergonomic principles in organizing work and use the principle of adapting work to the individual, without this leading to personalization or modification of virtuous practices or

procedures, particularly regarding workplace design, aiming for the selection of equipment and defining the most suitable working methods in line with technical progress and industry standards;

- Replace what is dangerous with what is not or is less dangerous;
- Plan prevention, aiming for a coherent system that integrates technique, work organization, working conditions, social relations, and the influence of workplace environmental factors;
- Provide adequate instructions to Workers;
- Ensure health monitoring of Workers;
- Provide adequate and sufficient information, training, and instruction to Workers;
- Plan measures deemed appropriate to ensure continuous improvement of safety levels, including through the adoption of good practices;
- Ensure the signing of work and service contracts and the relevant Unique Risk Assessment Document for Interference in all cases provided for by regulations; verify the technical-professional qualifications of contracting companies before signing the contract.


6 ENVIRONMENTAL PROTECTION

It is noted that DEFREMM S.p.A., in relation to its typical activity, is a production company with intense rhythms and high risks regarding the environment, using complex machinery that produces waste, scraps, oils, chemicals, and processing materials such as steel, aluminum alloys, copper, brass, and stainless steel. The Entity works to strictly comply with all applicable environmental laws, including through the involvement and awareness of individuals who, while not part of the corporate structure, are linked to the Company through contractual relations for managing environmentally impactful activities.

In particular, the Company:

- Adopts measures aimed at limiting and, if possible, eliminating the negative impact of economic activities on the environment;
- Prioritizes adopting measures to prevent any harm to the environment;
- Promotes the values of sharing environmental principles by following social developments and promoting the principles set forth in the Code among all Recipients.

The drafting of any type of environmental documentation required by law (both paper and digital), as well as the accounting registration of documents related to operations with third parties that have a connection, even indirect and potential, with environmental management, is based on criteria of clarity, truthfulness, and correctness. La redazione di qualsiasi tipo di documentazione ambientale richiesta dalla legge (sia

	Annex 1	CODE OF ETHICS	
		Rev.1 del 21/06/2024	Pag. 11 di 11

cartacea che informatica), nonché la registrazione contabile dei documenti inerenti alle operazioni con soggetti terzi che abbiano un collegamento, anche indiretto e potenziale, con la gestione ambientale, è improntata a criteri di chiarezza, veridicità e correttezza.

7 DISCIPLINARY MEASURES

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations for the Company's Employees, pursuant to articles 2104 and 2105 of the Civil Code, as well as for Consultants, Collaborators, Suppliers, and anyone who becomes a Recipient of this Code, with reference to the existing contractual relationship. Such measures are established by DEFREMM S.p.A.'s MOGC, of which this Ethical Code is a preamble and an integral part.

Violations of measures put in place to protect whistleblowers or the submission of unfounded reports made with intent or gross negligence are also subject to sanctions.

The Company, through the bodies and functions specifically designated for this purpose, imposes sanctions consistently, impartially, and uniformly, proportional to the respective violations of the Code and in accordance with current regulations regarding labor relations and the norms of the relevant Collective Contract.

Sanctions for employees are consistent with the measures indicated in the applicable National Collective Labor Agreement (CCNL).

Infractions committed by Recipients who are not employees are promptly communicated in writing to the Supervisory Board by anyone who becomes aware of them.

Such infractions are sanctioned by the competent bodies according to internal corporate rules and as expressly provided in the relevant contractual clauses (see resolution of law under articles 1453 of the Civil Code and subsequent ones).