

Code of Ethics

Fameccanica.Data S.p.A.
with single member

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1. PREAMBLE TO THE CODE OF ETHICS

1.1 *About us*

Fameccanica is an international Group operating in automation and robotics for the consumer goods industry. We develop high productivity machines and technologies and high value-added digital services, with an approach continuously aimed at sustainability, to meet the needs of competitiveness and innovation of our customers.

Since 1992, we are an equally-owned joint venture between the Angelini Group Holding and Procter & Gamble.

Our plants in Italy, China and the United States bring us close to our stakeholders, integrating local expertise with the values and experience of the Italian headquarters.

We believe in **innovation**, synonymous with creativity, research and growth of the Group and of each individual within it, as well as in **sustainability**, which inspires all our actions

The Center of Innovation

Fameccanica Italy is the corporate Headquarters and founder of Fameccanica Group, where all Fameccanica technological platforms are developed and designed and highly innovative machines are manufactured.

Here we study state-of-the-art projects, create pre-series, develop managerial organization and systems for all the Group.

The Asian Technological Pole

Fameccanica Machinery Shanghai is the Asian technological hub of the Fameccanica Group, a center of excellence where we build systems and upgrade kits. A center of excellence for the manufacturing and marketing of high technology lines mainly intended for the Asian markets and able to guarantee quality, reliability, performance and innovative cost-efficient solutions for customers.

Fameccanica North America

It provides top-notch quality in the manufacturing of machinery and spare parts, pre- and after-sales service for the North American market, ensuring a strong presence in the region.

A strategic partner that leverages the expertise of an international group to develop unique concepts, innovative technologies, along with consultancy and technical assistance.

1.2 *Our History*

Fameccanica was founded in 1975 in the province of Chieti thanks to the intuition of a young engineer and the Angelini family. Today it is a joint venture between the Angelini Group and Procter&Gamble and an international Group, with headquarters in Italy and two additional production plants in China and the United States.

Fameccanica develops highly automated machinery for the production of baby diapers, feminine care pads and incontinence products. We were able to diversify our range of solutions to include shampoo and detergent bottle filling machines, robotic solutions for the consumer goods industry as well as digital Apps and Services, keeping up with IoT and Servitization advancements.

Fameccanica, with the strategic partnerships established throughout the supply chain, the collaborations with higher education institutes and universities, the huge investments in research and development, has become over time synonymous with quality and reliability, piling up huge numbers such as 1200 machines delivered worldwide and over 600 recognized patents.

These numbers and strategies have secured major goals to the group, such as the design and supply of the world's fastest diaper converter in 2009, capable of producing 1000 pieces per minute;

Or the world's first machines equipped with a robotic bottle orienter and, finally, in May 2020 the design, production and installation, under a special agreement with the Italian Civil Defense Service during the COVID19 emergency, of the world's 25 fastest surgical mask production lines, with a 800

pieces/minute rate.

All these experiences testify to the group's continuous propensity to look ahead in order to always take up new challenges related to the evolution of technology and its possible applications to create a better world.

Our history has convinced us that everything is possible and that new goals can be achieved through our "behaviors": considering our employees as a strategic resource, ensuring respect for their rights and promoting their professional and personal development; valuing our suppliers as partners, helping them to grow in terms of product quality and internal processes and accompanying them along the journey to maturity in social responsibility; serving our customers by working with increasing efforts to satisfy their needs, both from a product performance quality standpoint and by meeting all the demands and expectations that arise as social responsibility takes shape.

1.3 Vision

We believe in **innovation**, which means creativity, research and **growth** of the Group and of each person inside.

We see **smart manufacturing** as an excellent opportunity to improve work processes and business development.

Fameccanica is the market benchmark acknowledged as the worldwide leader in innovation and advanced technology, quality and services, embodying the natural choice for companies in our industry.

We consider **smart manufacturing** as a powerful opportunity of work improvement and business development.

Our Values

Trust

Passion

Integrity

Responsibility

Excellence

Sustainability

1.4 Environmental and Social Sustainability

Fameccanica reiterates its commitment to a better and sustainable future, where business choices have a positive impact on the community and the surrounding environment.

It is with this spirit that Fameccanica teamed up with Treedom and planted a company forest of 12,000 trees, as a symbol of the social and environmental responsibility that the company wants to continue to pursue in the future.

Our collaboration with Treedom comes from the desire to give our small contribution to the sustainable development goals set by the UN in 2015 with the approval of the 2030 Agenda. This contribution aims to achieve the Sustainable Development Goals below:

NO POVERTY

ZERO HUNGER

QUALITY EDUCATION

GENDER EQUALITY

DECENT WORK AND ECONOMIC GROWTH

REDUCE INEQUALITIES

SUSTAINABLE CITIES AND COMMUNITIES

RESPONSIBLE CONSUMPTION AND PRODUCTION

CLIMATE ACTION
LIFE ON LAND
PARTNERSHIPS FOR THE GOALS

We are ready to support the community especially in situations of crisis or hardship.

Life + Glueless As Natural as it Gets

The **Glueless** project proves that a major drop in the environmental impact of absorbent hygiene products can be achieved by heavily cutting the use of glue in the manufacturing process, while cost competitiveness can even increase. This project was carried out also thanks to the EU funding under the Life + program.

1.5 People

People Development

Team success is built on the quality of its people and their ability to give their best in their own fields for mutual satisfaction. This is why we specifically focus on strengthening their motivation.

Working in Fameccanica.Data means being part of a solid enterprise, the **Angelini Group**, and at the same time of a multinational company, **Procter&Gamble**.

People play a key role within the Company: their abilities, skills and mastery are valued and constantly enhanced.

Fameccanica.Data wants to attract and develop motivated, result-driven people who are open to innovation and teamwork, by providing well organized management and technical training courses, both company-based and industry-based.

We are always looking for highly qualified people.

We believe in people who can draw on their knowledge, experience, creativity and motivation to work effectively and proactively.

"An empowered organization is one in which individuals have the knowledge, skill, desire, and opportunity to personally succeed in a way that leads organizational success".

Stephen Covey

In 2002 Fameccanica **was awarded Great Place to Work** and was among the top thirty best companies to work for in Italy.

The way you connect and interact with other people is called "interpersonal or soft skills". They are just as important as "hard skills", meaning the skills you learned in school, on the job, or from books. We believe in people who can use Emotional Intelligence at work, as well as being good at programming or engineering.

"If you treat an individual as he is, he will remain how he is. But if you treat him as if he were what he ought to be and could be, he will become what he ought to be and could be".

"Johann Wolfgang von Goethe"

Our people's strengths are: expertise in creating, engineering and testing the best machines; constant innovation to guarantee our customers a real competitive advantage in their market segment.

A success made by people. Not "just" projects but mutual exchange of experience, We make all of our customers feel at home, We love getting into contact with other cultures

Every handshake is an alliance towards a common goal.

Innovision

When Empowerment meets Innovation and Creativity, we have **Innovision**. It's an internal project involving all Fameccanica people, encouraging them to suggest original and innovative solutions that can turn into a competitive edge for the company and its Customers. It started in 2009 and every year the best ideas are awarded.

Thinking and Working as a Team

Our plants in Italy, China and the United States bring us close to our stakeholders, integrating local expertise with the values and experience of the Italian headquarters.

Collaboration and teamwork are the key words in our everyday activities.

The Global Sales & Marketing Department analyzes customer needs, market trends and prepares unique and effective proposals and promotes the best solution for the customer's current needs, takes care of them and helps them get the most out of the purchased equipment.

The R&D and Design department defines projects that meet customers' expectations through the use of advanced technologies, reliable processes and exclusive design.

The Global Operations Department is able to operate quickly and effectively, delivering orders accurately and on time.

Business Development deals with forecasting and developing growth opportunities in the markets, Project Management controls and monitors the correct execution of projects on a daily basis, from their concept to the installation at the customer's premises. The Legal and Administrative functions ensure compliance with current regulations and accounting principles.

Our partners:

Our Supplier is a Partner of Quality, a source of Innovation.

Procurement is the process of sourcing, negotiation and strategic selection of goods and services that are usually important for an organization. This involves selecting suppliers and purchasing.

We have created an interface between Fameccanica and our suppliers, in order to increase common efficiency and quality, as well as improve relationship transparency between our global sourcing department, the local purchasing departments and the supply chain worldwide.

By accessing the "*REGISTER*" section, new suppliers have the opportunity to present their companies and know-how, and we assure them that they will be evaluated and contacted by one of the Fameccanica departments, according to the area of expertise. Suppliers who wish to submit bids online can use the *RFQ* (Request for Quotation) *Login* section. Suppliers who already belong to our supply chain can manage their relationship with Fameccanica at any time from the *SRM* (Supplier Relationship Management) *Login* section, to check their online order portfolio, make changes to their delivery dates and check their performance evaluation.

A good supplier is able to meet our queries efficiently, operating in compliance with our standard, keeping information up-to-date, always striving to improve by learning from the audit results, demonstrating that innovation is the main goal. Availability, reliability, timeliness and customer service, along with a proactive attitude, are all key factors to meet our supply requirements in order to increase company competitiveness.

1.6 Certifications

Our care and respect for all those who come into contact with the Company, along with the recent needs of the global market, have led Fameccanica to become more sensitive to quality and customer satisfaction, health and occupational safety, environment and energy. Therefore, the Company has implemented management systems under the relevant voluntary international standards aimed at

measuring performance from this perspective, and has obtained the relevant certifications following periodic third-party audits carried out by accredited organizations.

The certifications that ensure, today as in the past, the quality, environmental protection and health and safety of people through energy efficiency processes, are:

ISO 45001 _ Health and Safety;

ISO 14001 _ Environment;

ISO 50001 _ Energy;

ISO 9001 _ Quality;

IMQ _ Covid Restriction;

2. OUR CODE OF ETHICS

To Fameccanica, the Code of Ethics is not mere bureaucracy or a simple list of general and abstract rules, but a document that combines *who we are* and our values. Therefore, the Code of Ethics is the tool that we have to clearly express the set of values, principles and responsibilities that Fameccanica recognizes, accepts, shares and undertakes.

In preparing Fameccanica's Code of Ethics, we were inspired by the Codes of Ethics of our major shareholders, Angelini Holding and Procter & Gamble Italia.

We believe that our Code of Ethics is a guideline capable of satisfying, in the best possible way, the needs and expectations of ethics and moral conduct of the stakeholders with whom we interact on a daily basis in our business.

We believe that acting by our values we can build a better future and achieve sustainable growth for all, creating value and opportunities for our *stakeholders*: our employees, the communities in which we operate, the market, society as a whole and the new generations.

Our daily actions are inspired by the highest ethical principles of business, including honesty, sincerity, fairness, integrity, responsibility, fairness, legality, transparency, anti-corruption and people first: these principles guide us in doing what is morally right and responsible in business, while never compromising with our founding values.

Anyone in Fameccanica is committing to always observe the law, the company's internal provisions, regulations and procedures, as well as this Code of Ethics, which are the foundations on which the whole organization is based. And we demand the same commitment also from our partners (suppliers, customers, consultants, visitors) on a daily basis.

All Fameccanica people, with no distinctions or exceptions, shall adapt their actions and conduct to the principles included in the Code of Ethics within the functions and responsibilities entrusted to them, being aware that compliance with the Code makes a fundamental part to the quality of their work and professional performance.

Also, from a corporate *Governance* standpoint, the Code of Ethics is an essential component of Fameccanica's organizational model and internal control system, as we believe that ethical principles in business management are a primary value to be pursued as a condition for business success. This is the approach we use to pursue the common interest, not just in taking care of our own legitimate

interests. Instead, as a priority task to be shared with other public, private and social players. This Code of Ethics is also an integral part of the Organization and Control Model and serves as the basis on which the preventive control system is founded for the purposes of Legislative Decree 231/01 containing the "Regulations on the administrative liability of legal persons, companies and associations, including unincorporated".

3. RECIPIENTS

The set of ethical principles, values and rules of conduct set out in this Code must inspire the actions of all those who operate, from the inside and outside, within the scope of action of Fameccanica, its *stakeholders*. In particular, by way of example: The Corporate Bodies, the Management, the People and Third Parties. All recipients are required to observe and, within their area of focus, enforce compliance with the principles contained in the Code: under no circumstances does the claim to be acting in the interest of Fameccanica justify behaviors against those described here. The Code also applies to Fameccanica activities abroad, while taking into account the regulatory, social, economic and cultural differences. The Company undertakes to promptly disseminate this Code inside and outside the company by:

- *Distributing it to all members of the Corporate Bodies and to all employees;*
- *Posting it in a place accessible to all;*
- *Making it available to the Recipients on the website*

Corporate Bodies

The provisions of our Code of Ethics apply, without exception, to the members of the Board of Directors, the Executive Committee, the members of the Board of Statutory Auditors, the Supervising Body and the other Control Bodies.

It is primarily the responsibility of the Corporate Bodies to put the values and standards of conduct of the Code into practice. In particular, the members of the Board of Directors are inspired by the principles of the Code when setting the goals of the Companies.

Management

Top managers and executives follow the principles of the Code of Ethics in pursuing the company's objectives and ensuring that these are respected and complied with in the performance of one's duties.

Executives put the values and principles contained in the Code into practice: their behavior is an example for employees and contract staff, they take on responsibilities towards the company and the outside and strengthen trust, cohesion and the spirit of Fameccanica.

Fameccanica People

All of us are called to contribute actively to implement the Code, to suggest any proposals for improvement and to report any violations. We must be fully aware of the rules contained in the Code and, consequently, ground our behavior and actions on the principles and rules of conduct in it. Compliance with the Code of Ethics is an essential part of our job and a necessary element in our work performance.

Third Parties

The provisions in the Code also apply to contract staff (e.g. consultants, representatives, intermediaries, agents, etc.), suppliers and all those who, either directly or indirectly, permanently or temporarily, have business relations with or work for Fameccanica.

Under no circumstances can the claim or belief that one is acting in the interests of Fameccanica justify behaviors against those set out in the Code of Ethics.

4. ETHICAL BUSINESS PRINCIPLES

The way we put ethical principles into practice is constantly applying them while carrying out our business.

The ethical business principles that we implement and foster inspire the culture, behavior and working methods of Recipients.

The set of ethical business principles leads the activities of all those who work in or with Fameccanica, taking into account the importance of the roles, the complexity of the functions and the responsibilities entrusted to each individual to pursue company objectives.

Ethical conduct is not simply about determining what is legal in any given situation. It is also about acting morally and responsibly in our business affairs while never compromising on our founding principles.

Under no circumstances should the belief to act to the benefit or in interest of Fameccanica be an excuse, not even partly, to behave against the principles established in this Code of Ethics.

4.1 *Honesty, Sincerity and Fairness*

The relationships we establish with our stakeholders are based on honest, sincere and fair conduct, both in internal and external relations.

Honesty, sincerity and fairness ensure that those who come into contact with Fameccanica will not receive any false statements, partial truths, missing information or misrepresentations of any kind.

All Fameccanica People are trustworthy, are loyal and fair to other people and institutions, and are absolutely dedicated to keeping the information they learn during their job confidential.

Fameccanica People cherish and develop their ability to make independent professional judgements, carefully avoiding any influences or illegitimate conflicts of interest.

Fameccanica People are loyal to Fameccanica and their colleagues, and if they decide to accept other jobs, they provide reasonable notice, respect the proprietary information of their former employer, and refuse to engage in activities that might lead to unfair advantage from their former positions.

4.2 Integrity

Fameccanica People's behaviors express sound personal integrity and the courage of their own ideas and beliefs, doing what they feel is right even when they are under pressure from others.

Fameccanica People have sound ethical principles and stand up for their beliefs.

4.3 Responsibility

All Fameccanica People acknowledge and accept personal responsibility for all their actions and/or failure to act, including from an ethical perspective.

4.4 Equality

Equality is the principle on which trustworthy and impartial conduct is built. It is the ability to maintain a constant balance between different interests: the specific and the general, those of the individual and those of the company, those of all shareholders and those of specific Stakeholders.

Fameccanica is committed to not discriminating in any way in hiring, compensation, access to training, promotion, termination or retirement on the basis of ethnicity, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation, age or other non-job-related personal characteristics, and is committed to operating impartially, ensuring equal employment and access opportunities for everybody and giving fair consideration to skills and merit.

4.5 Legality and Compliance

In carrying out our activities, we act in compliance with the laws and all applicable regulations in the regions where we operate, as well as dutifully observing our Code of Ethics and corporate procedures.

The principle of legality is paramount, and all those who enter into relationships with Fameccanica are subject to it.

All actions, operations, negotiations and, in general, the behaviors of Recipients when carrying out their job must be based on the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect, and must be open to checks and controls, in accordance with current regulations and internal procedures. All activities must be carried out with commitment and

professional accuracy. Each Recipient must contribute professionally according to their responsibilities and must act in such a way as to protect the image of Fameccanica.

4.6 Transparency

We promote clear, transparent and complete communication at all levels. We consider this a key factor in enabling Stakeholders to make independent and informed decisions, without favoring any interest group or single individual.

4.7 Fighting Corruption

We are committed to taking all the necessary measures to prevent and avoid corruption.

Corruption as a means of doing business is not allowed. We forbid, under all circumstances, bribing or attempting to bribe elected public office holders, public officers, public service providers or private citizens.

Specifically, none of us may offer, promise or transfer money or other benefits for the purposes of improperly accelerating, favoring, or facilitating the progress of an activity.

Nobody may offer or receive, either directly or indirectly, valuable items to anybody in order to get or maintain business, confidential information or an undue advantage for Fameccanica. Nobody may offer or receive money, gifts, favors, entertainment or travel expenses to, from or on behalf of a Public Officer or any other supplier, customer or competitor and involve consultants, agents, lobbyists, shareholders, subsidiaries or other third parties.

4.8 Conflict of Interest

Any situation of conflict of interest between personal or family business activities and the position held in the company must be avoided.

By way of example, a conflict of interest may arise when:

- Having economic and financial interests, including through family members, with suppliers or competitors;
- Using your own functional position to achieve interests conflicting with those of Fameccanica;
- Concluding, executing or initiating your own negotiations and/or contracts - in the name of and/or on behalf of Fameccanica - with your own family members or associates as counterparts, or with legal persons you own or have any interests in;
- Taking personal advantage of confidential information and business opportunities you have become aware of while doing your job within Fameccanica.

4.9 People first

Fameccanica would not exist without its people. We aspire to protect and nurture the value of our

human resources, and are committed to promoting respect for the physical, moral and cultural integrity of individuals and to increasing their skill base.

We respect and protect the dignity, equality and freedom of human beings, the cultural and physical integrity of people, their opinions and, at the same time, their differences.

We recognize diversity as an asset to be treasured and a resource to be drawn upon to establish and fruitfully pursue corporate objectives.

We will not stand for any discrimination, whether direct or indirect, on the basis of age, gender, sexual orientation, gender identity, state of health, ethnicity, nationality, religious beliefs, or political opinions of others.

We protect the vulnerable, offering support to those who find themselves in difficult social or economic circumstances or who experience difficulties with their physical or mental health.

4.10 Protection of Company Assets

All recipients are required to safeguard the company's assets by guarding Fameccanica's movable and immovable property, technological resources, equipment, company products, information and/or know-how. In particular, each recipient must:

- *Use company assets according to the policies and strictly observe all security programs to prevent unauthorized use and/or theft;*
- *Avoid improper use of company assets that could cause damage or reduced efficiency or, in any case, be contrary to the interests of Fameccanica;*
- *Strictly comply with the provisions of the corporate security policy, in order not to compromise the functionality and protection of computer systems;*
- *Not send threatening and/or insulting e-mail messages, not use rude and/or unprofessional language;*
- *Not make inappropriate comments that may cause offence and/or damage the company image;*
- *Keep and not disclose to any unauthorized third parties their own personal password and access credentials to company databases;*
- *Not reproduce company software for personal use, or use the tools provided for private purposes;*
- *Keep Fameccanica information confidential and not disclose it to unauthorized third parties.*

5. OUR ENGAGEMENT TO OUR STAKEHOLDERS

We build and define relationships with all Stakeholders based on sharing the ethical principles that inspire us.

We identify and group our Stakeholders into five different categories: People, Society, Market, Shareholders, and Land & Community.

Defining our commitments towards these parties, in consideration of their own specific role, helps us make decisions in line with our ethical principles.

5.1 People

All of us who, regardless of our contractual conditions or the legal nature of our relationship, are engaged in a working relationship with Fameccanica for the purpose of achieving corporate goals and objectives.

5.1.1 Employees

All the people who make up the workforce of Fameccanica.

5.1.2. Skill Enhancement

We are dedicated to valuing our employees by facilitating their personal and professional development, also through the creation of initiatives to develop their skills and abilities in line with the skills and talents of each individual. We provide our employees with the professional knowledge, updating and specializing tools necessary for planning training activities, aiming to allow all employees to access them as appropriate and following a careful examination of potential and needs. We value everybody's contribution and guarantee equal opportunities for growth based on the evaluation of results, assigning responsibilities consistent with the roles and paths of each individual and enhancing the skills acquired. Employees are evaluated in a transparent manner by managers, the HR Department and those who have come into contact with the employee being evaluated, using impartial, clear and known systems.

5.1.3 Equal Opportunities

We commit to guarantee equal opportunities to all employees in employment and career, while respecting diversity and valuing differences.

In every aspect of the working relationship — hiring, training, compensation, career advancement and transfers — the preferences of each employee are taken into consideration, while bearing in mind the needs of the company and avoiding all forms of unequal treatment. We aim to foster an open and inclusive working environment that welcomes diversity, which we consider an important resource.

5.1.4. Meritocracy

We reject all forms of nepotism, favoritism and inefficiency, in favor of a system where access to employment, earnings, and career advancement are based on each individual's abilities and merits, under established and clear rules and processes.

The decisions we make when recruiting, managing and developing staff result from a match between the profiles we are looking for and the employees' profiles, as well as objective considerations regarding the evaluation of expected performance.

5.1.5 Mental and Physical Wellbeing

From a social perspective, sustainability also includes recognizing the value of and encouraging off-work activities and relationships which contribute to the personal growth of every individual.

We encourage each employee to enjoy a work-life balance where their work and private lives are in harmony rather than in competition, contributing to people's mental and physical wellbeing.

5.1.6 Occupational Health and Safety

We promote, spread and strengthen a culture of occupational health and safety by identifying, assessing and mitigating risks and by encouraging all employees and contract staff to behave in a sensible and responsible fashion.

We guarantee that all employees will be given information and training on proper prevention.

We encourage all our employees to behave responsibly, in complete observance of the applicable regulations regarding prevention and protection. We abide by the specific laws and regulations of all the countries where we operate and comply with the highest international voluntary health and safety standards, striving for continuous improvement.

Fameccanica:

- Undertakes to implement safe activities in order to protect the health of its Employees and of the communities around facilities, to provide high quality and high value products in order to improve the life of consumers and the environmental quality of its products and activities necessary to manufacture them.
- As a tangible guarantee of our quality and a promise of transparency made to our people, our customers and the entire Fameccanica ecosystem, we have chosen to apply appropriate and adequate measures to fight and reduce the spread of COVID-19 in the workplace, as required by regulatory protocols.
- Is proud to announce that it has obtained the IMQ COVID RESTRICTION certification issued by IMQ; it is an important achievement that testifies to Fameccanica's constant commitment to protecting people's health and safety. Ensures that its Policy on Safety, Health and the Environment will not be called into question by operational strategies.
- Regularly revises its systems performance and efficiency to achieve the Safety, Health and Environment targets.

- Regularly informs its Employees on its Policy on Safety, Health and the Environment, and provides a specific training.
- Requires that each Employee understands and keeps a safe conduct in his/her daily work, respecting the environment and the health of oneself and the others.

5.2 Shareholders

Those who own Fameccanica's shares, who guide it and lead the way.

It is in our interest to increase the value of Shareholders' investments by implementing an industrial policy that guarantees a satisfactory economic return over time, not only by optimizing available resources, but also through increased financial strength and competitiveness and the development of innovative and sustainable ideas.

We guarantee accurate and truthful reporting flows on company activities, to monitor its performance and optimize its processes.

We also guarantee the communication of transparent and efficient financial information to investors, collaborators, customers and business partners, as well as public and private institutions.

5.3 Society

It includes all stakeholders who play, in one role or another, a key part in the proper functioning, reputation and development of Fameccanica and who expect us to create sustainable growth and value in addition to demanding the maximum quality from our products.

5.4 Customers

Customers are an essential asset for Fameccanica and a unique opportunity for us to achieve success.

In our relationships with customers, we behave according to the principles of honesty, fairness, transparency and trustworthiness.

Fameccanica's behavior towards its customers is grounded in respect, legality and professional attitude. Contracts with customers and all communications must be clear, simple, compliant with current regulations, without recourse to elusive and/or unfair practices and complete so as not to overlook any element that may be relevant to the customers' decision. Fameccanica undertakes to examine and promptly accept complaints and/or claims from customers.

5.4.1 Quality of Products and Services

We are committed to being attentive to changing market needs and up-to-date on advancements in technology and science, to constantly improve the quality, safety and sustainability of our products and the services we provide to customers. For these purposes, our research & development, production and customer care activities are held to quality standards of the utmost excellence.

5.5 *Institutions*

Our relationships with local, national and international institutions are based on maximum transparency and fairness. In particular, in dealings with Italian and foreign Public Institutions, we are guided by the principles of collaboration and non-interference, respecting the mutual roles.

We maintain relationships with Institutions through the authorized corporate departments, upholding the strictest observance of legislative and regulatory provisions.

5.6 *Lobbying*

We look to the registers of international institutions, if available, to ensure lawfulness and transparency in managing lobbying activities.

We require for anyone carrying out lobbying activities to divulge their corporate role and the nature of the interests they represent by providing relevant and accurate information.

Lobbying is performed by providing exhaustive information to public decision-making bodies to complete the framework of knowledge they can refer to and help in decision-making processes.

5.7 *Media*

We deal with the world of information and communication exclusively through appointed corporate functions, in accordance with our policies on the subject. Communications directed outside the company are truthful, accurate, transparent and coherent.

When it comes to our participation in conventions and congresses or public events, as well as the creation of advertisements or the drafting of press releases and publications in general, the information provided about business, performance, products and strategies will be disclosed in compliance with the procedures we established for the treatment of confidential information.

5.7.1 Communication and Social Media

We recognize the crucial role that clear and effective communication plays in both internal and external relationships. In fact, external relationships and communication have a direct and an indirect influence on corporate development and image.

We aim to ensure that the information revealed and distributed through social media is fair, without limiting the freedom of expression of Fameccanica "ambassadors".

5.8 Academy

We cooperate with scientific organizations and, in general, with the academic world. Our only criteria in selecting these relationships are related to the quality and scientific or specific expertise of the provider.

We prioritize relationships with universities, as they are essential to our growth in terms of innovation, development, and the promotion of the culture and values that we share.

5.9 Political Parties and Trade Unions

Our relationships with political parties and trade unions are based on the principles of transparency, fairness and cooperation.

We do not make contributions of any kind, directly or indirectly, to political parties or to their representatives or candidates.

We promote and support an open dialogue with Trade Unions. We respect the right of all personnel to form and join trade unions and access collective bargaining. Fameccanica will ensure that representatives of such personnel do not suffer discrimination and that they can reach out to their members in the workplace.

5.10 Market

All the third parties who, individually or as part of a value chain, provide us with the resources we need to carry out activities and provide services, sharing our comprehensive approach to sustainability and working with us to achieve common goals.

This category of also includes the associations with which we enjoy constructive relationships in running business. We include our competitors in the market, as a constant benchmark and an incentive for continuous improvement.

5.11 Business Partners, Contract Staff and Consultants

Our conduct in our relationships with Business partners, contract staff and consultants is based on principles of transparency, equal opportunities, loyalty and free competition.

We are also committed to seeking Partners who share the principles of our Code of Ethics, professionalism and dedication, and to prioritizing the building of long-lasting relationships for the continued improvement of the business.

In executing their contractual relationships or assigned duties, we require our partners to behave with fairness, loyalty, and in good faith, respecting — to the extent applicable to each partner — the provisions of our Code of Ethics, corporate regulations, and the instructions and indications issued.

5.11.1 Equal Opportunities and Meritocracy in Decision Making

Our Partners are selected based on the values and criteria of ethics, reputation, sustainability, fair pricing, and quality goods or services, as well as guarantees of assistance and timeliness.

This selection is defined by the search for the greatest possible competitive advantage for Fameccanica, and by loyalty and impartiality towards each Partner possessing the necessary requirements.

5.11.2 Due Diligence

Our relationships with our Partners are based on respect for general ethical principles, and we constantly monitor. We perform due diligence to ensure that our requirements are met both before entering into a contract and after, during contract execution.

5.12 *Competitors*

We recognize the value of competition as an integral part of corporate culture and policy and the constant and long-lasting commitment to respect it.

5.13 *Trade Associations*

We encourage participation in Trade Associations as a place of unity and dialogue among all members.

To contribute to Association activities in a proactive, fruitful manner, authorized People will participate in Association activities.

5.14 *Land & Community*

We do not simply mean a physical, geographical location, or a sociological concept. We mean the places where we have our roots, where we live and work, and where our children too will live and grow up. These are places where we can create sustainable growth for all and opportunities for new generations.

Therefore, to us social responsibility means not only fully complying with legal requirements, but also investing in human capital, in communities, and in our relationships with other stakeholders, cooperating on a shared sustainable development plan. We support social accountability through the promotion of ethical values, quality management and responsible organization, with a view to sustainable development.

5.14.1 Local Communities

We shape our business activities on a harmonious relationship with the communities where we operate, working together to promote positive behaviors and plan our activities responsibly and with a focus on the rights of future generations.

We are committed and contribute to the economic and social fabric of Local Communities, with special attention to the demands and inputs from them.

We are inspired by fundamental and universal values: focus on people, care for the vulnerable, education, respect for the environment we live in. These values are timeless while uniquely modern and shape the way we look towards the future.

5.14.2 Environmental Protection

We implement an effective environmental management system which adheres to the laws and regulations of all the countries where we operate, as well as complying with the highest voluntary international standards in the field.

We place particular importance on making an active contribution to environmental sustainability goals, by adopting practices aimed at reducing emissions, saving energy, and recycling.

We are committed to acting sustainably, minimizing our environmental impact and optimizing our use of natural and energy resources. In particular, we use these resources responsibly to avoid compromising the needs of future generations and to create value for all of our stakeholders, with the utmost respect for the land and its communities.

The focus of our attention is on respecting and promoting this commitment to sustainability by making responsible investments.

5.15 *Socially Useful NPOs and Associations*

We support and promote the social and cultural initiatives of socially useful NPOs and associations that comply with the principles of environmental and social responsibility, as well as with the objectives that serve as our guidelines in supporting them.

We are mindful of social issues and support corporate volunteering initiatives.

5.16 *Other Stakeholders*

In our relationships with any other stakeholders not explicitly listed here we abide by all the general principles and values mentioned and described in this Code of Ethics.

6. THE RULES OF CONDUCT: DOING THE RIGHT THING

We demand moral integrity from our employees, who are required to comply with the most rigorous principles of ethical behavior in the performance of their duties.

6.1 Our Shared Responsibilities

We must read, understand, and respect the principles and rules of conduct described in our Code of Ethics, as well as the laws and corporate procedures that apply to our role or function.

It is our duty and our responsibility to take part in training initiatives regarding the Code of Ethics or corporate procedures relevant to our work, and to immediately report any violations of the Code or of the law which we may become aware of.

As part of our day-to-day work, we may find ourselves having to take positions or making decisions of an ethical nature, sometimes without any specific rules to guide us. In these situations, we are still required to make the right decision, and although our Code of Ethics may not provide the answer for every specific situation, we should consult it often, apply common sense in our actions, and always ask for help in case of need.

In other words, whenever we find ourselves in doubt about the fairness, lawfulness or appropriateness of a decision, we should stop, think, and consult our supervisors or the managers of the relevant corporate departments.

The Code of Ethics is a guide and framework for the Recipients to support them in always making the right decisions, in line with our values.

On the one hand, it serves as a tool to help us learn and understand the principles, standards, and policies which apply within Fameccanica; On the other, it is also an expression of shared values and our way of doing business, allowing us to work in an open, honest and ethical manner.

The rules of conduct below apply to our daily activities on:

- How we work
- How we communicate
- How we behave.

6.2 How we work

Each of us contributes personally to promoting and maintaining an atmosphere of mutual respect in the work environment.

We pledge to create and encourage a positive work environment for all, revolving around protecting the dignity and inviolability of the individual as well as the principles of fairness in personal relationships, thereby allowing all employees to do their job to the best of their abilities.

In conducting our activities, we are required to:

- Be fair and polite in our relationships with colleagues, working together and making our contribution actively and proactively whenever possible;
- Behave professionally and moral integrity;
- Respect the interests of all other parties;
- Ensure that our language and behavior are suitable for the environment where we work.

6.2.1 Respect and Tolerance

As employees, we must avoid any conduct which may be interpreted as harassment of any kind, psychological abuse, or any other behavior which is discriminatory or damaging to people. We aim to promote an atmosphere of tolerance and respect for human dignity within the company. Therefore, we must avoid and discourage:

- Behaviors which might create an intimidating or offensive atmosphere for our colleagues or partners;
- Behaviors which may offend the sensibilities of others, including unacceptable behaviors such as unwanted physical contact, and improper gestures and statements, or displays;
- Retaliation against any employee who, in good faith, opposes or reports any cases of discrimination, harassment, or offence against individuals.

Each Employee shall report actual or potential illegal behaviors/abuses at workplace, such as threats or aggressions against Employees or corporate properties, or however any alleged infringement of rules, laws, directives and procedures.

Supervisors and HRBPs must pay attention and listen to what reported by the Employees or their concerns about any possible infringement and must take the necessary preventive measures to eliminate or minimize the risks, keeping a professional conduct while showing maximum respect for individuals, as well as preventing any situation which may worsen, rather than improve, the situation.

6.2.2 Safety and Sobriety in the Workplace

We place special focus on respecting safety — our own and that of others — in the workplace. In particular, we cannot:

- Possess or consume narcotic substances, alcohol, or substances with a similar effect during the course of our working activities or in the workplace;
- Smoke in the workplace, even where this is not forbidden by national law.

6.3 How we communicate

Ethical communication means handling confidential information, material regarding Fameccanica, and personal data which we process during our job with truth, fairness and in accordance with

applicable regulations.

6.3.1 Accuracy of Official Records and Recommendations on Document Drafting

All official documents on the management of Fameccanica must be accurate, truthful, complete and compliant with the regulations in force, with no exceptions.

With no exceptions, all Fameccanica funds must be recorded in the official documents of Fameccanica and each income and outflow shall be accurately and completely identified.

Fameccanica does not approve of concealed payments through Third parties, such as agents or consultants.

It is compulsory to comply with the laws on accurate and thorough bookkeeping, also with reference to Fameccanica, books of accounts, financial statements and any corporate information.

Any document involving Fameccanica, even if issued for internal use only, may be used for legal purposes.

Therefore, any document must be drafted according to ethical principles and basing on factual data which cannot be misunderstood, in order to avoid any negative consequence, even only on the image of the Company only, whether it becomes public or stays in-house.

Accounting Transactions

Each accounting transaction must be duly authorized and verifiable. Entries in the accounting system must be recorded under the criteria set by the Law, the accounting principles and the relevant corporate procedures. Each accounting transaction and its documents must be kept in the company's records for as long as required by the Law, in order to allow accounting entry, easily keep an official and chronological track of the transactions, check the authorization and execution process, as well as identify all the responsibility and control levels involved.

If Fameccanica employees become aware of any omission, false information or obscurity in the accounts or in the documents on which the entries are based, they must inform their supervisor or report the case to the Supervising Body in accordance with the provisions of the paragraph "Supervising Body Tasks";

6.3.2 Digital Platforms and Social Media

The communications with stakeholders, including through the media, are centered on respect for the right to information and the prohibition to reveal fake or biased news or comments.

For this reason, when using digital platforms or other social media we must:

- Express our personal opinions with the stipulation that they do not represent the position or the opinions of Fameccanica and are not in any way binding upon it;
- Refrain from publicly revealing confidential information, personal data owned by Fameccanica, personal information concerning other people without their consent or any information marked "for internal use only".

6.3.3 Information Confidentiality

Each of us may, depending on our position, directly or indirectly become aware of confidential information concerning our Companies, such as know-how, strategies, products, research and

development activities, financial performances, etc.

This information has strategic value and represents an invaluable asset that each of us is required to protect it and not divulge, behaving with integrity in relation to the information and data of third parties and safeguarding such data, preventing their use for any purposes not connected to working activities, for personal and in any case unauthorized purposes or advantages.

6.3.4 Personal Data Protection

Spreading an internal awareness and culture of personal data protection is the first step towards regulatory compliance. For this reason, we place a strong emphasis on accountability in all organizational roles and in the Departments and Functions which contribute, each within their area, to creating and/or maintaining the Privacy Governance model.

This is why we have adopted a Privacy Governance model and a Privacy Policy, defining the roles and responsibilities of the players involved in processing personal data.

In particular, we pledge to guarantee and demonstrate that data are processed in compliance with the requirements of the legislation in force and in accordance with the principles applicable to the processing.

6.4 How we behave

Having studied and understood the ethical business principles that inspire Fameccanica in its relationships with its stakeholders, we are also required to consider how they actually apply to us, how to behave in the event that we encounter ambiguous situations or unlawful conduct in our daily activities and, if necessary, what to do.

6.4.1 Fighting Corruption

In carrying out our duties, we are required to stand against all forms of corruption and to take a zero-tolerance approach towards any unlawful activities.

All transactions must be conducted transparently and must be duly documented.

We are required to acknowledge to any alarm bells that may indicate illegal, corrupt or any form of unethical behavior and to take on the responsibility of reporting such conduct.

Gifts, Gratuities and Hospitality

The giving of gifts and donations, including for reasons of hospitality, is a useful means of building or strengthening friendly and legitimate business relationships with partners.

Nonetheless, such activities are subject to regulation as part of the fight against corruption.

Gifts and hospitality of any kind must be:

- In line with our corporate policies, and in any case permissible under the receiving party's policies regarding gifts and hospitality;
- Be offered, given or received in good faith;
- Of modest or symbolic value;
- Be reasonable and appropriate in terms of the occasion and frequency with which they are provided;
- Commensurate with the relevant local or national traditions in relation to hospitality.

6.4.2 Sponsorship and Donations

We only consider sponsorships and donation that are in line with Fameccanica's strategic goals, the principles of environmental and social responsibility, and the positions adopted by the governing bodies of the Company.

The beneficiaries of sponsorships or charitable initiatives shall be determined by more than one party, based on the merits of the initiative or the beneficiary.

All sponsorships or charitable initiatives must be granted to respectable beneficiaries and with no existing conflict.

Sponsorships and charitable initiatives must always be awarded in accordance with the specific guidelines adopted by the Company.

6.4.3 Objectivity and Conflict of Interest

We protect and foster the interests of Fameccanica by making decisions objectively and avoiding, as much as possible, situations that might give rise to conflicts of interest.

These situations arise whenever a decision or behavior, as part of work activities, may be considered likely to create a personal advantage, whether immediate or delayed, in contrast with that of Fameccanica.

In general, the following must be avoided:

- Situations where personal interests, financial interests, or acquaintances are in conflict with the interests of Fameccanica;
- Making decisions or performing activities that are in conflict with the interests of Fameccanica or incompatible with official duties;
- Influencing or allowing negotiations in the name of and on behalf of Fameccanica to be conditioned by factors, connections or personal relationships;
- Taking personal advantage of business opportunities learned of while performing one's duties within Fameccanica.

As a general rule, no Employee of Fameccanica nor any of his/her family members should own shares or earn a profit from capital investments in any competitor or supplier or customers with which he/she is in contact when doing his/her job. A small investment in competitors, suppliers or customers of Fameccanica listed on the stock exchange, or a small ownership share through investment fund or fiduciary deposit, do not stand as a conflict of interest, provided that it does not impact on the Employee's engagement in favor of Fameccanica.

A conflict of interest arises when an Employee of Fameccanica has any economic interest competing with the same company which may distract their energy and skills from their duties and responsibilities towards the company or which may turn detrimental to it in any way.

A conflict of interest arises when an Employee of Fameccanica whose spouse or family member is employed by Fameccanica may influence business decisions (positions, pay rises, etc.) about the family member. Similarly, a conflict of interest arises when an Employee of Fameccanica whose family member is the owner of/is employed by a customer, supplier or competitor of Fameccanica, takes part, even indirectly, (disclosing any documents or confidential material of Fameccanica) into decisions about the relations between Fameccanica and such company or discloses to his/her family member any confidential documents and material.

An Employee involved, either directly or indirectly, in the purchase of goods or services for Fameccanica cannot hold interests in the companies providing those goods or services. The same principle also applies when the purchase of goods or services is linked to corporate investments.

A conflict of interest arises when a Fameccanica Employee or any one of his/her family members provides goods or services to Fameccanica as a supplier. A conflict of interest also arises when a Fameccanica S.p.A. Employee or any of his/her family members holds an economic interest in a supplier company. This also applies when the Employee, despite having no direct working relations with the supplier, may influence the activities of Fameccanica.

6.4.4 *Selecting Business Partners*

Due to the significant liability and reputational implications that we may encounter as a result of the actions of our business partners, we identify and select these partners based on objective, verifiable criteria which aim to strike the perfect balance between financial benefits and service quality.

In selecting our business partners, we must take into account the following general principles of conduct:

- Establish transparent, collaborative relationships in line with the best business practices, scrupulously observing the applicable legislation and internal procedures related to the selection and management of relationships with business partners;
- Carefully evaluate the reputation and background of partners before initiating or renewing a relationship, as well as the economic, financial, technical and asset-related reliability of the other party;

- Refrain from accepting gifts, donations, or other benefits, even those of modest value, if the purpose of the contribution is to obtain an unlawful advantage, and from making such contributions beyond what is permitted by corporate practices.

6.4.5 Preventing Unlawful Financial Activities

We want to avoid our activities or services from being used to facilitate financial crimes, such as money laundering, tax evasion, funding terrorist activities, or any other form of participation in unlawful activities.

Consequently:

- We may not establish relationships with partners, suppliers or third parties whose respectability is not guaranteed, who do not have good reputation or whose name is associated with matters connected to money laundering or other unlawful activities;
- We must always ensure that financial transactions are duly justified by contractual relationships and that their traceability is guaranteed;
- We must always accept the responsibility of reporting suspicious counterparts, requests, transactions and/or payments.

6.4.6 No Unfair Competition

Each of us is responsible for respecting all laws related to competition, antitrust, and the collection of competitive information in the countries where we pursue our activities.

We are therefore required to refrain from conduct that may, in any way, cause a distortion of competition in the markets affected by activities of Fameccanica's Companies.

We refrain from collecting sensitive information of a competitive nature through unlawful means and from sharing with competitors any sensitive information of a competitive nature belonging to Fameccanica.

6.4.7 Relationships with the Public Administration

We ensure the strictest observance of legal provisions in our relationships with the Public Administration and abide by principles of transparency, fairness, and collaboration in their management.

Therefore, in managing relationships with the Public Administration, we must refer to the following principles of conduct:

- Do not promise or offer Public Officers money, goods or benefits of any other kind aimed at inducing conduct benefiting the interests of the individual or the Company;

- Do not submit false statements or documents to Public Administration agencies in order to obtain funding, aids, concessions, authorizations, licenses or other administrative acts;
- Refrain from engaging in any transactions with the Public Administration while aware of the potential arising of conflicts of interest;
- Ensure compliance with transparency requirements set out in the regulatory provisions in force within each Public Administration.

We must assume the responsibility of reporting any actual or potential violation committed by internal actors or third parties, using all the mechanisms for reporting made available to Fameccanica.

7 CORPORATE AND CONTROL GOVERNANCE

We pay close attention to the processes through which strategic and economic decisions are made, as well as our procedures for developing corporate goals and the means to attain and measure final performances.

In this context, we have prioritized the adoption of a Corporate Governance system and an approach to fight corruption in all its forms and methods.

7.1 *Corporate Governance*

We have adopted a Corporate Governance system inspired by the highest standards of transparency and fairness in Company management.

Specifically, our corporate governance system not only represents an essential tool ensuring the effective management and control of activities within the company, but it also focuses on creating value for shareholders, on the quality of customer services, on controlling business risks and on transparency towards the market.

7.2 *Internal Control and Risk Management System*

It is our duty to spread at all levels a culture of risk management and raise awareness of the existence of control measures, to shape and guide managers' attitudes and decisions in pursuing corporate goals.

For this reason, we have established a Governance model for the Internal Control and Risk Management System in order to enhance our capacity to prevent and manage corporate risks, in line with the most recent and consolidated best practices for Control Governance.

The Internal Control and Risk Management System is based on the following principles:

- Consistency with the strategic goals of Fameccanica;

- Risk-based approach;
- Adoption of risk management best practices;
- Structured and integrated information flows.

7.3 *Implementation Methods*

Our Code of Ethics applies to the entire Fameccanica Group, in any country and at any level of the organization, while taking into account cultural, social and economic diversity.

We promote raising awareness on the Code and monitor compliance with it, providing appropriate tools and procedures for information, prevention and control and, where necessary, taking corrective measures.

The implementation of the Code of Ethics depends on the commitment and responsibility of all Recipients, through full awareness of the contents of the document and the values that inspired it.

7.4 *Adoption of the Code of Ethics*

Fameccanica's Code of Ethics comes into force on the date it is approved by the Board of Directors.

The Code of Ethics is subject to regular review by Fameccanica. Any update, change or addition must follow the same validation process adopted for the approval of the initial text.

As long as they are compatible and directly applicable, Fameccanica adopts the Codes of Ethics of Angelini Holding and Procter & Gamble Italia.

The principles and rules included in this Code of Ethics also apply to other Group Companies, whether they are Angelini or Procter & Gamble.

In the event of a mismatch between the principles expressed in this Code of Ethics and local legislation, the most restrictive provisions apply, whether expressed in the Code or in the legal system.

7.5 *Communication and Dissemination*

We require all Recipients to be familiar with the principles and content of our Code of Ethics. Therefore, we ask everyone to read the Code and to understand the principles and rules contained in it, to consult the bodies responsible for its dissemination, awareness-raising about it and compliance in case of doubts regarding its application or interpretation, and to actively contribute to its effective implementation, including by reporting any conduct that may be non-compliant.

7.6 Training

We promote distribution and knowledge of the Code of Ethics through information and training initiatives aimed at raising awareness on the principles and rules of conduct that apply to everyday activities and on how they are implemented.

7.7 Control Methods

We require all stakeholders to observe this Code of Ethics.

Fameccanica undertakes to set and impose with consistency, impartiality and uniformity, penalties that are proportionate to the respective violations of the Code of Ethics and that comply with current regulations governing employment relations or business relations or partnerships.

We consider compliance with the Code of Ethics as an essential part of the contractual obligations of Fameccanica employees. Non-compliance with its principles is a breach of the obligations under the employment contract and/or a disciplinary misconduct, with all legal consequences, including the continuation of the employment contract and may result in damage compensation due to such violation.

Complying with the rules set in the Code of Ethics makes a fundamental part of the contractual duties undertaken by Third parties having a business relation with Fameccanica. Therefore, violation by any third party to Fameccanica of this Code of Ethics, the implementation policies and methods, any applicable law or regulation will cause contractual penalties or affect the relationship, including termination of business relations or partnerships and may result in damage compensation resulting from such violation.

7.8 Obligation to be Familiar with the Code and to Report possible Violations

Every Fameccanica person is required to be familiar with the principles and contents of the Code as well as the relevant procedures that govern the functions and roles covered.

Everybody in Fameccanica must:

- Refrain from behaving against such principles, contents and procedures;
- Carefully select, within their own field, their collaborators and lead them to full compliance with the Code;
- Ask third parties that come into contact with Fameccanica to confirm they have read the Code;
- Report to their supervisors and to the Supervising Body their own findings or news given by stakeholders about possible cases or claims of violation of the Code. Reports of possible violations are sent according to the provisions of the paragraph "Supervising Body Tasks";
- Cooperate with the Supervising Body and with the functions assigned by the specific procedures to verify possible violations;

- Take immediate corrective actions when required by the situation and, in any case, prevent any kind of retaliation.

It is understood that no one may conduct personal investigations or report the news to others except to their own supervisors or to the Supervising Board, or anonymously in accordance with the Whistleblowing provisions. If after reporting the news of a possible violation somebody believes they have suffered retaliation, they may contact the Supervising Body directly.

8. SUPERVISING BODY TASKS

The Supervising Body is the one accountable for monitoring compliance with the Code of Ethics.

More precisely, the Supervising Body has the following tasks:

- Monitor compliance with the Code of Ethics;*
- Make their own observations regarding any ethical problems that may arise in the context of company decisions and any alleged violations of the Code of Ethics referred to it;*
- Provide operational support in the interpretation and implementation of the Code of Ethics, as a constant benchmark for maintaining the right conduct when performing one's job;*
- Monitor and coordinate the revision of the Code of Ethics, including proposing adjustments and/or updates;*
- Prepare and approve the ethical communication and training plan;*
- Report to the Human Resources Department any violations of the Code of Ethics, suggesting the penalty to impose and verifying that the penalties imposed have been applied;*

9. WHISTLEBLOWING

Anybody who witnesses, becomes aware of, or suspects anything unethical, illegal, or contrary to our Code of Ethics, policies or procedures is obliged to disclose what they know by lodging a report.

It is the right and responsibility of each Employee to promptly report in good faith any matter believed to be potentially illegal, improper, or in any way contrary to the Code.

Reports must be based on precise and consistent factual elements which the whistleblower has become aware of through the performance of their duties. They can be submitted through the dedicated Whistleblowing platform, or via other suitable communication tools.

We guarantee no retaliation or discrimination, either direct or indirect, shall befall to any on anyone who has issued a report.

We conduct our investigations confidentially under legislative provisions, to ensure the protection of the whistleblower and the identity of the individuals reported on, using appropriate procedures and criteria for handling information and documents.

We handle reports through a structured and transparent process, in compliance with the relevant corporate policies.

10. EFFECTIVENESS OF THE CODE OF ETHICS AND CONSEQUENT PENALTIES

Complying with the provisions set in this Code of Ethics makes a fundamental part of the contractual duties of the employees, pursuant to and for the purposes of article 2104 of the Italian Civil Code. Any violation of the provisions of the Code of Ethics may constitute a breach of the obligations of the employment contract and/or a disciplinary misconduct, under the procedures laid down in art. 7 of Law no. 300/1970, with all the consequences under the Law and the contract. With regard to recipients other than employees (suppliers, consultants and anyone who has established a collaborative relationship), in case of violation of the provisions contained in this Code, the Company reserves the right to terminate the relevant contractual relationships.

11. CODE OF ETHICS APPROVAL AND CHANGES

This Code of Ethics was approved by the Board of Directors of Fameccanica Data.SpA and distributed to all the Group Companies. As a result of this dissemination within the Group, the Code of Ethics applies to all subsidiaries. Any changes and/or updates to the Code will be approved by the same Governing Body and communicated to the Recipients.

May 2021

**Fameccanica.Data S.p.A. With single member
The Board of Directors**