



Organisation, Management and
Control Model pursuant to
Legislative Decree no. 231/2001

Annex no. 2

Code of Ethics

INDEX

PREAMBLE	4
ASSUMPTIONS, RECIPIENTS, PURPOSE AND VALUE OF THE CODE	4
1. GENERAL PRINCIPLES	6
1.1 COMPLIANCE WITH LAWS, ETHICAL RULES, REGULATIONS AND PROCEDURES	6
1.2 CONFLICT OF INTEREST	6
1.3 HARASSMENT AND DISCRIMINATION	7
2 RULES OF CONDUCT TOWARDS STAFF	8
2.1 HUMAN RESOURCES - EQUAL OPPORTUNITIES.....	8
2.2 RECRUITMENT	8
2.3 PERSONNEL EVALUATION	9
2.4 RIGHTS AND DUTIES OF EMPLOYEES	9
2.5 PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE	10
2.6 ENVIRONMENTAL PROTECTION	11
3 RULES OF CONDUCT TOWARDS THE PUBLIC ADMINISTRATION	12
3.1 RELATIONS WITH THE PUBLIC ADMINISTRATION.....	12
3.2 RESPECT FOR THE IMPARTIALITY AND GOOD PERFORMANCE OF THE P.A.....	12
3.3 RELATIONS WITH PUBLIC INSTITUTIONS AND SUPERVISORY AUTHORITIES	13
3.4 RELATIONS WITH THE JUDICIAL AUTHORITIES	13
3.5 OFFER OF MONEY, GIVEAWAYS OR OTHER BENEFITS.....	14
3.6 INFLUENCE ON THE DECISIONS OF THE P.A.....	14
3.7 EMPLOYMENT RELATIONSHIPS WITH THE P.A.	15
3.8 TRANSPARENCY IN THE MANAGEMENT OF PUBLIC FUNDING AND CONTRIBUTIONS OF THE PUBLIC ADMINISTRATION.....	15
3.9 CONFLICTS OF INTEREST WITH THE PUBLIC ADMINISTRATION	15
4 RULES OF CONDUCT IN RELATIONS WITH SUPPLIERS, CUSTOMERS AND THIRD PARTIES.....	15
4.1 SELECTION.....	15
4.2 MANAGEMENT OF THE CONTRACTUAL RELATIONSHIP	16
4.3 GIFTS, OFFERS AND GIVEAWAYS	16
5 RULES OF CONDUCT IN RELATIONS WITH THE COMMUNITY.....	17
5.1 MEDIA RELATIONSHIPS.....	17
5.2 ECONOMIC RELATIONS WITH POLITICAL PARTIES AND TRADE UNION ORGANISATIONS AT NATIONAL LEVEL.....	18
6 RULES OF CONDUCT IN BUSINESS ACTIVITIES.....	18
6.1 OPERATIONS AND TRANSACTIONS	18
6.2 PURCHASE OF GOODS AND SERVICES AND HIRING OF EXTERNAL CONSULTANTS	19
6.3 MANAGEMENT OF INFORMATION SYSTEMS, CONFIDENTIALITY OF INFORMATION AND PRIVACY	19
6.4 USE OF NOTES, CREDIT CARDS, STAMP DUTY	20
6.5 INSTRUMENTS AND SIGNS OF RECOGNITION AND PROTECTION OF COPYRIGHTS.....	20
6.6 TERRORISM AND SUBVERSION OF THE DEMOCRATIC ORDER	21
6.7 PROTECTION OF THE INDIVIDUALS.....	21

6.8	ACTIVITIES AIMED AT RECEIVING STOLEN GOODS, MONEY LAUNDERING, USE OF MONEY, GOODS OR BENEFITS OF ILLICIT ORIGIN AND SELF-LAUNDERING	21
6.9	TRANSNATIONAL ACTIVITIES AND PROTECTION AGAINST ORGANISED CRIME	22
6.10	SAFEGUARDING OF COMPETITION	23
6.11	SMUGGLING.....	23
7	PRINCIPLES RELATING TO CORPORATE AND TAX OFFENCES	23
7.1	MANAGEMENT OF THE COMPANY'S ACCOUNTING, ASSET AND FINANCIAL DATA AND INFORMATION	23
7.2	MANAGEMENT OF FISCAL ASPECTS	24
7.3	RELATIONS WITH THE COMPANY'S CONTROL BODIES	24
7.4	PROTECTION OF THE COMPANY'S ASSETS.....	24
7.5	PROTECTION OF THE COMPANY'S CREDITORS	24
7.6	CONFLICT OF INTEREST OF DIRECTORS	24
7.7	INFLUENCE ON THE SHAREHOLDERS' MEETING	25
7.8	SPREADING OF FALSE NEWS.....	25
7.9	RELATIONSHIPS WITH PUBLIC SUPERVISORY AUTHORITIES.....	25
7.10	RELATIONSHIPS WITH BANKING OPERATORS	25
7.11	RELATIONSHIPS BETWEEN PRIVATE INDIVIDUALS	26
8	METHODS OF IMPLEMENTATION, MONITORING AND DISSEMINATION.....	26
8.1	THE SUPERVISORY BODY.....	26
8.2	SANCTIONS	26
8.3	INTERNAL REPORTING	27
8.4	KNOWLEDGE AND DISSEMINATION	27
9	FINAL PROVISIONS.....	27
9.1	CONFLICT WITH THE CODE	27
9.2	CODE AMENDMENTS.....	27
10	DECLARATION OF ACKNOWLEDGEMENT AND ACCEPTANCE OF THE CODE OF ETHICS OF ALFASIGMA S.p.A.....	28

TERMS AND DEFINITIONS

Legislative. Decree no. 231/2001 or “Decree”	Legislative Decree no. 231 of 8 June 2001, entitled “ <i>Regulations governing the administrative liability of legal entities, companies and associations, including those without legal personality</i> ”
“Alfasigma” or the “Company”	Alfasigma S.p.A.
BoD	Alfasigma S.p.A. Board of Directors
Top Management	Chief Executive Officer or Board of Directors
Organisational model or Model	Organisation, Management and Control Model adopted pursuant to Legislative Decree no. 231/2001
SB or Body	Supervisory Body
P.A. (Public Administration)	Public Administration
Code of Ethics or “Code”	This Code of Ethics, adopted by the Board of Directors of Alfasigma S.p.A. pursuant to Legislative Decree no. 231/2001
Disciplinary System	Disciplinary System adopted pursuant to Legislative Decree no. 231/2001
Third Parties	All parties with whom Alfasigma S.p.A. has entered into a contract
Recipients	All those who act on behalf of, operate and/or collaborate in any capacity with Alfasigma S.p.A. (shareholders, members of the Board of Directors, statutory auditors, employees, consultants, suppliers, partners and Third Parties in general)

PREAMBLE

This Code of Ethics expresses the commitment of the Alfasigma Group to operate in compliance with the laws and regulations in force in all the countries in which it operates and in accordance with the principles and values of an ethical nature clearly defined in this Code, so that they constitute the basic element of the corporate culture and the standard of conduct adopted by all those who operate, act on behalf of, and/or collaborate with Alfasigma S.p.A. in any capacity.

ASSUMPTIONS, RECIPIENTS, PURPOSE AND VALUE OF THE CODE

What is the Code of Ethics for?

The purpose of this Code of Ethics is to provide ethical and behavioural guidelines to be compliant with in the performance of one's duties, as well as to contribute to preventing the occurrence of administrative offences dependent on the crimes provided for by the Decree.

To whom is the Code of Ethics addressed?

All those who act on behalf of, operate, and/or collaborate in any capacity with the Company find themselves having to deal with situations that require them to adopt behaviours that are relevant from an ethical and legal point of view (so-called "Recipients" of the Code).

The principles and rules contained in the Code apply to the following Recipients:

- to all employees of the Company, regardless of their role and function;
- to the members of the various corporate bodies;
- to any third party who may act on behalf of the Company;
- to Third Parties who have relations with the Company, such as, by way of example, consultants, agents, proxies, suppliers, commercial partners and in general all contractual counterparties with whom the Company conducts negotiations or concludes agreements for any reason.

What does Alfasigma S.p.A. expect from the Recipients of the Code of Ethics?

All the Recipients of this Code, as identified above, have the duty to behave, and ensure that their collaborators and interlocutors behave, in accordance with the principles of honesty, loyalty, good faith, balance, correctness and diligence, as well as the specific obligations that may derive from deontology.

In the absence of specific provisions, it is necessary that all Recipients, in carrying out their activities, are inspired by the highest standards of conduct, taking into account that the correct conduct to be maintained in every situation originates from good faith, transparency, impartiality, honesty and loyalty of those who act.

The Company does not intend to entertain relations with parties who do not commit themselves to respecting the principles and rules contained in this Code. To this end, the Company shall include clauses in its contracts with such parties to ensure compliance with this Code.

In no way may the conviction of acting in the interest or to the advantage of the Company justify the adoption of conducts in contrast with the principles indicated in this Code. The application of and compliance with the principles set out above, in particular for employees and collaborators, are part of the more general

obligations of collaboration, correctness, diligence and loyalty required by the nature of the service, to which everyone is bound in the performance of any service in favour of the Company.

The aforementioned obligations, in particular for employees of the Company, supplement the provisions of Articles 2104 and 2105 of the Italian Civil Code and of the Italian National Collective Bargaining Agreement applicable and in force.

This Code is an integral part of the Organisation, Management and Control Model adopted by the Company pursuant to Legislative Decree no. 231/2001.

1. GENERAL PRINCIPLES

1.1 COMPLIANCE WITH LAWS, ETHICAL RULES, REGULATIONS AND PROCEDURES

Recipients are required to diligently comply with the laws in force in all the countries in which the Company operates, the Code, any other ethical provisions to which the Company has adhered and internal regulations. In no case may the pursuit of the Company's interest justify dishonest conduct that does not comply with current legislation, the relevant ethical provisions and this Code.

Employees and collaborators are also required to comply with operating procedures and company protocols.

In the exercise of their respective activities, the Recipients are required to know and comply with the rules of law (national, supranational) of the countries in which they operate. Any violations of regulations must be reported to the relevant authorities.

Each Recipient is called upon to contribute with his or her conduct in the context of the work activity to the promotion of integrity, legality and transparency, also providing the Supervisory Body and the subjects/bodies required to carry out control activities with data/information within their competence, in compliance with the terms prescribed by the regulations in force.

The decision-making processes adopted by employees must be traceable by means of adequate documentary support, which allows replicability at any time.

1.2 CONFLICT OF INTEREST

A conflict of interest is defined as when a personal interest or the interest of a family member or relative conflicts with the interest of the Company. This situation may interfere with the ability to make decisions and adopt behaviours in the exclusive interest of the Company.

General principles

A conflict of interest may exist/arise if when carrying out your tasks you:

- have personal interests, including economic and financial interests, whether direct or indirect, which may influence your work;
- may gain personal advantage, financial or otherwise, through improper access to and use of Company information;
- may take personal advantage of Company business opportunities;
- work for or on behalf of the Company's suppliers;
- disseminate, even during informal meetings, confidential information on the activities carried out by the Company before it has officially announced them;
- exploit your position or role to gain personal advantage of any kind;
- if representatives of customers, suppliers or public institutions act contrary to the fiduciary duties associated with their position;
- accept money, favours or benefits not due from persons or companies that are or intend to enter into business relations with the Company.

Operational rules

Where the Recipients of the Code find themselves or believe they may find themselves in a position of conflict of interest, they must refrain from taking any decision and/or carrying out any activity whose effects fall, directly or indirectly, on the Company.

Any Recipient who finds themselves in a position of actual or potential conflict of interest has the duty to promptly inform their Manager or company contact person, giving the reasons for the potential conflict. This situation must be communicated to the Head of Department, who may authorise the carrying out of the activity in conflict of interest only after assessing it and taking the necessary measures to put an end to the reported conflict. If necessary, the Top Management must be informed.

At the reasoned request of the Company and/or the Supervisory Board, the interested party is required to provide further information on the actual or potential conflict of interest situation in which he/she believes he/she may be involved.

It is therefore prohibited to:

- carry out actions and behaviours potentially in conflict with the Company's activities or with the purposes and interests that it pursues;
- carry out activities or take decisions which may be connected, directly or indirectly, with an interest, financial or non-financial, of one's own, of one's spouse, of relatives up to the fourth degree of kinship and/or of cohabitants, of connected persons (friends, acquaintances, etc.) or of organisations of which the aforementioned persons are directors or managers, which may undermine the duty of impartiality and conflict with the activity and purposes of the Company, in the name of or on behalf of which one works;
- give in to undue pressure and/or accepting to render services in the event of offers or proposals of remuneration, compensation or benefits of any kind that may prejudice one's impartiality;
- make offers, accept assignments or provide services in any way when it can be justifiably inferred from known elements that the activity contributes to illegal or illegitimate operations and/or in any case incompatible with the principles of lawfulness, morality and transparency;
- promote any form of participation or contiguity in illicit affairs in any way connected and/or traceable to organised crime or in any case to subjects involved in malfeasance;
- disclose confidential information that has come to your knowledge in the performance of professional duties.

1.3 HARASSMENT AND DISCRIMINATION

General principles

The Company does not tolerate any form of discrimination or harassment in the workplace

- It guarantees a working environment that values the diversity of employees, in accordance with the principle of equality, taking care to protect the dignity and freedom of each employee in the workplace;
- It will not tolerate any kind of discrimination based on personal characteristics and/or inclinations, such as, for example, race, colour, gender, political, trade union, religious or sexual orientation, country of origin, age, state of health, physical or mental disability, pregnancy, marital status;
- It imposes an obligation to refrain from any harassing act or behaviour, intimidation and coercion;
- It does not allow sexual harassment, where "sexual harassment" refers to any unwanted act or behaviour, including physical, verbal and non-verbal attitudes, with sexual connotations that offend the dignity of the person subjected to it;
- It also does not permit the creation of a climate of intimidation against the person subjected to such harassment.

Operational rules

Those who believe they are being subjected to harassing or discriminatory behaviour or are aware of ongoing acts of intimidation, discrimination or harassing and/or discriminatory behaviour must inform their Manager and/or Top Management, as well as the Supervisory Body, who will promptly and confidentially take all the actions deemed appropriate, in order to allow the uncomfortable situation to be overcome and a peaceful working environment to be restored.

2 RULES OF CONDUCT TOWARDS STAFF

2.1 HUMAN RESOURCES - EQUAL OPPORTUNITIES

General principles

Human resources are an indispensable element of the company organisation and represent the main source of the Company's success.

The Company offers all employees equal opportunities, on the basis of merit criteria and in compliance with the principle of equality and allows each employee to develop his or her aptitudes, skills and competencies, preparing, if necessary, training and/or refresher courses.

The Company protects disabled workers by encouraging their integration in the working environment.

The Company undertakes to fully exploit all the professional skills present in the corporate structure, by activating the available levers to favour the development and growth of its collaborators/employees.

Operational rules

All employees must be aware of the regulations governing the performance of their duties and the consequent behaviours; if this is not the case, it is advisable for the employee to report the existing situation of non-compliance to their Manager.

The Company ensures that all collaborators/employees are provided with information and training tools with the aim of enhancing the specific skills and developing the professional value of each person.

2.2 RECRUITMENT

General principles

The personnel selection process must be aimed at selecting the most suitable person on the basis of the correspondence of the candidates' profiles and their specific skills with the company's needs, as expressed by the requesting department and in compliance with equal opportunities for all the persons concerned.

The information requested is strictly related to the verification of professional profile and psycho-aptitude, respecting the privacy and opinions of the candidate.

The promise to hire a person in exchange for favours constitutes a crime.

Operational rules

Favouritism, nepotism or forms of patronage are prohibited in the selection and recruitment phases.

The Company must verify compliance with the principles outlined above, within the limits of the information available, as well as adopt appropriate prevention measures.

The Company is absolutely forbidden to employ foreign workers without a residence permit or with a permit that has been revoked or expired, for which no application for renewal has been submitted, documented by the relevant postal receipt.

2.3 PERSONNEL EVALUATION

General principles

The Company undertakes to ensure that in its own company organisation the annual objectives of personnel, both general and individual, are such as not to induce unlawful behaviour and are, instead, aimed at obtaining a possible, specific, concrete, measurable result and related to the time foreseen for their achievement.

Operational rules

Any situation of inconsistency or conflict with the aforementioned principle must be promptly reported by anyone to his or her manager, as well as to the Supervisory Body, so that they may take any necessary corrective action.

2.4 RIGHTS AND DUTIES OF EMPLOYEES

Operational rules

The Company's employee is required to, among other things:

- know and comply with current legislation, processes, procedures and company guidelines as well as the principles contained in this Code;
- comply with the provisions and instructions issued by the Company, by the manager or, in any case, by their Managers;
- comply with all obligations necessary to protect health and safety in the workplace;
- provide colleagues, managers and/or supervisors with adequate cooperation, communicating all information and adopting all behaviours that allow to operate with maximum efficiency in the execution of the tasks assigned and in the pursuit of common objectives;
- avoid abusing or generating false beliefs in relation to one's position, role or powers within the Company and the Company's role itself, intervening immediately in order to eliminate any and all misunderstandings;
- not perform acts contrary to the duties of office, or omit or delay an official act for the undue receipt or promise of money or other benefits for themselves or others;
- in order to maintain the trust of the market and in particular of the suppliers towards the Company, treat everyone in a correct and fair way, avoid favours or pressures, real or apparent, in order to obtain particular advantages from certain suppliers;
- in general, keep confidential all the information in their possession in the course of their work, for example information relating to the Company's activities, financial and economic information and information concerning their suppliers, customers and business partners;
- treat information covered by confidentiality as strictly confidential,
- even after the termination of the employment relationship, employees are required to treat with absolute confidentiality data, news and information of which they came into possession during the course of their work;
- not use information obtained in the course of the activity carried out for the Company for personal purposes or to obtain advantages of a financial or non-financial nature;

- promote awareness of the Code among all parties with whom they have formal and informal relations in the course of their activities;
- not disclose any information about the Company's suppliers to Third Parties and in particular to other suppliers of the Company;
- not denigrate, under any circumstances, the Company and/or those who have had relations of any nature or for any reason with it;
- not participate in informal meetings with persons interested in obtaining information on relevant issues regarding office activities, unless expressly authorised by their manager;
- avoid joining associations, clubs or other bodies of any kind, if they may give rise to obligations, constraints or expectations that may interfere with the exercise of their activities;
- report truthfully and correctly to the Company the information that they are required to provide, such as, for example, the summary report of time spent, the expense report, the minutes of the activities carried out, etc;
- not use for personal needs, except in particular cases of urgency, the work tools, including telephone lines, and take care of the premises, furniture, vehicles or materials made available to them;
- acquire the professional skills necessary for the performance of duties and maintain, for the entire duration of the employment relationship, an adequate level of knowledge and experience, constantly updating their preparation and attending any refresher or requalification courses proposed and activated by the Company;
- not derive profits or advantages, direct or indirect, financial or otherwise, with or without damage to the Company, from the performance of their work;
- behave and use language and dress appropriate to the work environment;
- punctually and proactively comply with the requirements of the Model (such as, for example, training courses, sending reports, attending meetings with the SB, etc.), avoiding obstructive behaviour that could compromise the functioning of the Model, the SB and the supervisory activities of the functions responsible for control.

2.5 PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE

General principles

Within the framework of the regulations in force, the Company undertakes to adopt all the necessary measures to protect the physical and moral integrity of its workers, adopting all the necessary measures to guarantee a safe and protected working environment.

In particular, the Company undertakes that:

- compliance with existing legislation on the health and safety of workers is considered a priority;
- the risks for workers are, as far as possible and guaranteed by the evolution of the best technology, avoided also by choosing the most appropriate and less dangerous materials and equipment to mitigate the risks at source;
- non-avoidable risks are properly assessed and adequately mitigated through appropriate collective and individual safety measures;
- the information and training of workers is widespread, updated and specific with reference to the task carried out;
- consultation of workers on health and safety at work is guaranteed;
- any safety requirements or non-conformities that emerge during work activities or during audits and inspections are dealt with quickly and effectively;

- the organisation of work and its operational aspects are carried out in such a way as to safeguard the health of workers, Third Parties and the community in which the Company operates.

Operational rules

Workers, each to the extent of their competence, are required to ensure:

- compliance with the laws in force on Health and Safety in the workplace in the various countries in which the Company operates, and their subsequent updates;
- compliance with the principles of this Code and company procedures and any other internal provision provided for to ensure the protection of health and safety in the workplace;
- the reporting of any violations or even simple attitudes or practices in contrast with the provisions of the Code of Ethics and the Model and other company provisions for the protection of health and safety in the workplace;
- taking all reasonable precautions to maintain a safe and healthy working environment;
- compliance with the defined rules of conduct so as not to put themselves or others at risk by their actions;
- promptly reporting to the competent functions and to the SB all facts and behaviours detected or which may compromise the safety of the work environment.

It is also absolutely forbidden for all Recipients to:

- carry out services under the influence of alcohol or drugs;
- ignore the ban on smoking in the workplace, or in any case, even where smoking is not prohibited by law, behaving in a way that is insensitive to the needs of those who may feel discomfort due to the effects of “passive smoking”.

2.6 ENVIRONMENTAL PROTECTION

General principles

The Company's essential objective is to comply with current environmental legislation in all the countries in which it operates.

To this end, the Company undertakes to:

- continuously improve the environmental performance of its processes and meet all relevant legislative and regulatory requirements;
- minimise environmental impact by optimising the use of resources;
- seek solutions compatible with the exercise of sustainable development, aiming at the enhancement of natural resources, minimum land consumption and minimum waste of energy sources;
- avoid, within the limits of the functions performed, cause alterations to the environment in which it operates that may affect the ecological balance and/or the conservation of cultural, artistic, historical and landscape heritage.

Operational rules

The Company monitors the environmental impacts of its activities and systematically seeks to improve them in a consistent, effective and sustainable manner.

In particular, the Company undertakes to:

- take in stimuli of those suppliers who make sustainability their own development strategy;
- prefer suppliers who demonstrate the best performance in terms of sustainability;
- where, for the purposes of fulfilling environmental protection obligations, it is necessary to use the services of authorised parties (disposers, transporters, etc.) possessing the highest requirements of reliability, professionalism and ethicality.

The Company uses products with a low environmental impact and prioritises recycling in its offices. The Company's environmental commitment is also aimed at raising the awareness of its employees, who are required to:

- contribute to the fulfilment of the obligations envisaged by the provisions of environmental law;
- participate in organised training and education programmes.

3 RULES OF CONDUCT TOWARDS THE PUBLIC ADMINISTRATION

3.1 RELATIONS WITH THE PUBLIC ADMINISTRATION

General principles

The Company's relations with the Public Administration, public officials or persons in charge of a public service, which include healthcare workers within the national healthcare system of each country in which the Company operates, politically exposed persons, their family members and persons known to be connected to them, must conduct themselves in full compliance with the laws and regulations in force and be inspired by the strictest impartiality and fairness, as well as by the principles and values of this Code of Ethics, and shall not compromise the integrity or reputation of the Company in any way.

Operational rules

Undertaking of commitments and the management of relations, of whatever nature, with the Public Administration, public officials or persons in charge of a public service, are reserved exclusively to the company departments in charge of this and to personnel authorised by virtue of specific mandates or proxies. These subjects are required to diligently keep all documentation relating to their relations with the Public Administration.

Within the scope of relations with the Public Administration, with public officials or persons in charge of a public service, politically exposed persons, their families and persons known to be connected to them, the Recipients are required to abstain from:

- offering, even though a third party, money, work or business opportunities or, more generally, other benefits;
- unlawfully seeking or establishing personal relationships of favour, influence, interference capable of influencing, directly or indirectly, the outcome of the relationship.

3.2 RESPECT FOR THE IMPARTIALITY AND GOOD PERFORMANCE OF THE P.A

General principles

The Company, the corporate bodies and their members, employees, consultants, collaborators and in general Third Parties who act on behalf of the Company in dealings with the Public Administration, in Italy and in all countries in which the Company operates, inspire and adapt their conduct to the respect of impartiality and good performance required by the Public Administration.

3.3 RELATIONS WITH PUBLIC INSTITUTIONS AND SUPERVISORY AUTHORITIES

General principles

The Company maintains relations with public institutions on the basis of the principles of integrity, correctness and professionalism.

Operational rules

The Recipients are required to scrupulously observe the regulations in force in the sectors related to their respective areas of activity and the provisions issued by the competent Institutions and/or Supervisory Authorities.

Recipients shall promptly comply with any request from the Inspection and/or Supervisory Authorities responsible for carrying out checks or controls, providing full cooperation and avoiding obstructive behaviour.

3.4 RELATIONS WITH THE JUDICIAL AUTHORITIES

General principles

The Company operates in a lawful and correct manner, cooperating with the Judicial Authority and the Bodies delegated by it.

In the context of any existing disputes, the activity carried out for the management of the latter shall be based on the principles of legality, correctness, transparency and in compliance with all the other ethical principles defined in this Code.

Operational rules

All Company personnel and those who work on behalf of the Company must promptly communicate to the department with which they collaborate any information relating to the possible occurrence, or existence, of a criminal trial concerning an offence provided for in the Decree, against themselves or any subject of the Company and inherent to the activity they perform in the Company.

Managers, employees and collaborators in any capacity of the Company must refrain from unlawful conduct, such as, by way of example:

- give or promise money or other benefits to public officials or persons in charge of a public service, to their family members or to persons indicated by them, so as to influence the impartiality of their judgement;
- send false documents, certify non-existent requirements or provide untrue guarantees/declarations;
- delete documents or destroy archived documents;
- give or promise money or other benefits to the legal advisors of the companies involved in a dispute in order to obtain a favourable result in the dispute.

The Company must protect the confidentiality of the information received on any proceedings in progress, in compliance with applicable laws, identifying the persons who may become aware of it and defining the procedures for filing and storing it.

All Recipients are prohibited from exerting any type of pressure on persons involved in a proceeding in any capacity or role, such as, by way of example:

- promising pay raises or career advancement,
 - threatening dismissals or reductions in compensation, as well as other forms of demotion or transfer.
- Any legal proceedings relating to the crimes covered by the Decree must be promptly notified to the SB.

3.5 OFFER OF MONEY, GIVEAWAYS OR OTHER BENEFITS

General principles

The Company condemns any conduct, on its behalf, by the Company bodies and their members, or by employees of the Company, as well as by consultants, collaborators and Third Parties acting on behalf of the Company, consisting in promising or offering, directly or indirectly, money, services or other benefits to Italian or foreign public officials and/or persons in charge of a public service, to their family members or to persons indicated by them, in all countries in which Alfasigma operates, from which the Company may obtain an undue or illegal interest or advantage, except in the case of gifts or other utilities of modest value and, in any case, within the scope of customs and traditions.

It is also forbidden to accept gifts, compensation or other benefits except those of modest value. Gifts and other benefits, with the exception of those of modest value, however received, must be immediately returned to the sender.

The gifts/giveaways offered must always be authorised by the head of the department and must be adequately documented in order to allow for any verifications.

For the purposes of this paragraph, as a criterion for defining the “*modest value*” of gifts or other benefits, it is possible to refer to the limit of EUR 150.00, as set out in Presidential Decree no. 62/2013 Regulations on the conduct of public employees, the amount to be considered as the maximum limit in the calendar year for donations made by the same person.

Operational rules

The Company abstains from practices that are not permitted by law, by commercial practices or by the Codes of Ethics - if known - of the entities with which it has relations.

The gifts offered must always be authorised by the department manager and must be adequately documented in order to allow for any verifications.

Each department manager periodically and/or at the specific request of the SB, shall send specific reports/information regarding the quantity, entity and beneficiaries of any gifts granted/authorised.

3.6 INFLUENCE ON THE DECISIONS OF THE P.A.

General principles

The persons appointed by the Company to follow any business negotiation, request or relationship with the P.A. in all the countries in which the company operates, must not for any reason seek to unlawfully influence the decisions of the public officials or persons in charge of a public service who deal with and make decisions on behalf of the P.A.

Operational rules

In the course of a business negotiation, request or commercial relationship with public officials and/or persons in charge of a public s, in all the countries in which the Company operates, the following actions may not be taken - directly or indirectly:

- propose, in any way, employment and/or business opportunities that may benefit public officials and/or persons in charge of a public service personally or through a third party;
- offer money or other benefits in any way, except for gifts, giveaways or other benefits of modest value and, in any case, within the scope of legitimate custom or practice;
- perform any other act aimed at inducing Italian or foreign public officials to do or omit to do something in violation of local laws and regulations.

3.7 EMPLOYMENT RELATIONSHIPS WITH THE P.A.

Operational rules

It is prohibited to establish employment relationships and/or any other form, including the conclusion of consultancy contracts with former employees of the Public Administration, in all the countries in which the Company operates, who, because of their institutional functions, participate or have participated personally and actively in business negotiations, unless such relationships have been previously and adequately assessed by the Top Management, and communicated to the Supervisory Body, before proceeding with the possible hiring/establishment of the relationship.

3.8 TRANSPARENCY IN THE MANAGEMENT OF PUBLIC FUNDING AND CONTRIBUTIONS OF THE PUBLIC ADMINISTRATION

General principles

The Company condemns any behaviour aimed at obtaining, from the State, European Bodies or other public body, any type of contribution, financing, subsidised loan or other disbursement of the same type, by means of altered or falsified declarations and/or documents, or by means of omitted information or, more generally, by means of artifices or deception, including those carried out by means of a computer and/or telematic system, aimed at misleading the disbursing body.

3.9 CONFLICTS OF INTEREST WITH THE PUBLIC ADMINISTRATION

Operational rules

The Company may not be represented in its relations with the Public Administration, whether Italian or foreign, by persons in a recognised position of conflict of interest, unless this situation has been adequately declared in advance to the Top Management, as well as to the Supervisory Board, and the former has assessed the possibility of granting the aforementioned power of representation.

Individuals working on behalf of the Company are obliged to refrain from having relations with the Public Administration, whether Italian or foreign, in any case in which situations of conflict of interest exist.

4 RULES OF CONDUCT IN RELATIONS WITH SUPPLIERS, CUSTOMERS AND THIRD PARTIES

4.1 SELECTION

General principles

In the relationships with suppliers, customers and Third Parties all must be inspired by the principles of absolute honesty, loyalty, good faith, balance, fairness, diligence, effectiveness, efficiency, clarity, impartiality, transparency and confidentiality.

Operational rules

In particular, any conduct that may result in unjustified favouritism to a supplier, customer or other third party over others, causing prejudice or damage, even indirect, to the Company, must be avoided,

In choosing suppliers, the primary objective is to avoid any discrimination and allow maximum participation and competition among potential suppliers. The existence of conflicts of interest, real or potential, must be promptly reported in order to prevent them from influencing the selection process (see Section 1.2). Therefore, within the scope of the provisions of current legislation and the relevant ethical provisions, the internal procedures established for managing the supplier selection phase must be observed and the relationship with suppliers must be managed correctly, including during the contract execution phase.

Business relationships must be maintained only with reputable customers, companies, partners and suppliers who are engaged in legitimate business activities and whose revenues are derived from legitimate sources.

4.2 MANAGEMENT OF THE CONTRACTUAL RELATIONSHIP

Operational rules

In relations with suppliers, Recipients are forbidden from:

- accepting non-existent performances;
- authorising undue payments,
- entrusting Third Parties with illegal or unethical activities.

At the same time, Recipients must:

- manage the relationship with Third Parties according to rules of fairness in order to have business relations with the Company;
- check for any potential conflicts of interest before dealing with a third party;
- choose qualified business partners who have a good reputation for quality and honesty;
- ensure that all contracts with suppliers, customers and Third Parties in general comply with the Company's corporate policies, current regulations and the relevant ethical provisions.

4.3 GIFTS, OFFERS AND GIVEAWAYS

Gifts are defined as tangible or intangible goods, money services, or any other direct or indirect benefit.

General principles

As regards relations with customers, gifts and entertainment expenses must be compatible with current legislation and market practices, must not exceed the permitted value limits and must have been approved and recorded in accordance with internal rules.

Relationships with customers, both public and private, are based on a sense of responsibility, commercial correctness and a spirit of collaboration.

Reference is made here to the general principles expressed in section 3.5 of this Code of Ethics.

Operational rules

None of the Recipients may solicit, or in any case accept, directly or indirectly, for example through their family members, gifts from suppliers, even if only potential, of the Company, if they may appear to be in any way connected to existing relations with the Company or suggest the purpose of acquiring undue advantages.

- It is forbidden to: pay or offer, directly or indirectly, payments and material benefits of any kind whatsoever to influence or compensate them for an act of their office
- engage in illegal, collusive practices and conduct, illicit payments, attempted bribery and favouritism.

It is possible to accept gifts of symbolic and modest value, the offering of which falls within custom, when these gifts:

- are carried out in compliance with the applicable legislation;
- have not been solicited by the recipient;
- may not give the impression that their offer is in compensation for undue advantages acquired or to be acquired;
- are normally offered to any other party with similar relationships or on anniversaries or holidays.

Anyone who receives, even at home, gifts as a result of the activity carried out or to be carried out in favour of the Company and falling within the scope of the prohibitions indicated above, has the duty to inform their Manager or Top Management, ensuring the immediate return of said gifts.

The gifts/giveaways offered must always be authorised by the head of the department and must be adequately documented in order to allow for any verifications.

Each department manager periodically and/or at the specific request of the SB, shall send specific reports/information regarding the quantity, entity and beneficiaries of any gifts granted/authorised.

5 RULES OF CONDUCT IN RELATIONS WITH THE COMMUNITY

5.1 MEDIA RELATIONSHIPS

General principles

The Company's communication with the mass media must be transparent and truthful. Any form of pressure or the acquisition of favourable attitudes by the media shall be avoided.

Operational rules

Relationships with the mass media are reserved exclusively to the corporate function in charge of this, which manages them subject to authorisation from Top Management and in compliance with Company policies. All other Recipients are prohibited from providing information to representatives of the mass media, and they are obliged to communicate to the competent function any question put to them by representatives of the mass media.

The Company also recommends to all Recipients to:

- refrain from speaking or writing to the media on behalf of the Company, unless authorised in advance;
- avoid talking or writing about topics that are not within their professional competence;

- make sure there is no confusion between their personal interests and those of the Company (for example, avoid using Company letterhead or e-mail to express personal opinions or to authorise transactions for personal purposes).

5.2 ECONOMIC RELATIONS WITH POLITICAL PARTIES AND TRADE UNION ORGANISATIONS AT NATIONAL LEVEL

Operational rules

Direct or indirect contributions to political parties, movements, committees and political or trade union organisations, as well as to their representatives and candidates, are prohibited in any form.

The Company also prohibits any initiative of sponsoring events/congresses or parties that have a political propaganda purpose, except within the limits allowed by the law and following the adoption of an express resolution of the administrative body, refraining from any direct or indirect pressure to political representatives.

6 RULES OF CONDUCT IN BUSINESS ACTIVITIES

6.1 OPERATIONS AND TRANSACTIONS

Operational rules

Every operation and/or transaction must be legitimate, authorised, consistent, congruous, documented, recorded and verifiable at all times. All actions and operations of the institution shall be properly recorded and it shall be possible to verify the related decision-making, authorisation and execution process.

For each operation there must be documentary support suitable to allow, at any time, the performance of controls that attest to the characteristics and motivations of the operation and identify who authorized, performed, recorded, verified the operation itself.

Any person who carries out operations and/or transactions involving sums of money, goods or other economically valuable utilities, belonging to the Company, must act upon authorisation and provide on request all valid evidence for its verification at all times.

Each company department is responsible for the truthfulness, authenticity and originality of the documentation produced and of the information provided in carrying out the activities for which it is responsible.

Respect for the principles of fairness, transparency and good faith in relations with all contractual counterparties must be guaranteed.

Assignments given to any service companies and/or individuals who look after the economic/financial interests of the Company must be drawn up in writing, indicating the contents and the economic conditions agreed upon. Any exceptions must be duly authorised and justified.

With reference to the commercial/professional reliability of suppliers and partners, all necessary information must be requested and obtained in order to assess the reputation/reliability of the contractual counterparty.

6.2 PURCHASE OF GOODS AND SERVICES AND HIRING OF EXTERNAL CONSULTANTS

General principles

Employees and individuals who make any purchase of goods and/or services, including the hiring of external consultants, on behalf of the Company, must act in accordance with the principles of transparency, fairness, cost-effectiveness, quality, inherent and lawfulness and exercise care and diligence, and in compliance with the specific procedures and/or internal regulations of the Company.

Operational rules

In addition, the above parties must commit to:

- select suppliers and consultants on the basis of the procedures in force, in compliance with the criteria of reliability and competence of the professional, and confer offices on them by means of a formal contract/letter of appointment;
- define as far as possible the exact content of the service and any project output so as to allow verification of the service rendered even after the event;
- duly archive all documentation, in particular the final version of documents, including correspondence;
- provide the consultant with the Company's Code of Ethics or have them download it from the Company's website, acquire a formal commitment to comply with the provisions contained therein, and include in consultancy contracts a specific clause of compliance with the Code of Ethics, in order to sanction any conduct contrary to the ethical principles of the Company;
- not pay or offer, directly or indirectly, payments and/or material benefits of any kind whatsoever to influence or compensate an act of their office;
- not engage in illegal, collusive practices and behaviours, illicit payments, attempts at corruption and favouritism;
- avoid exchanging courtesy giveaways or acts of hospitality that do not have an eminently symbolic value;
- not award fees that are not justified by the type of assignment or by local practice.

6.3 MANAGEMENT OF INFORMATION SYSTEMS, CONFIDENTIALITY OF INFORMATION AND PRIVACY

General principles

The Company condemns any behaviour consisting in the alteration of the functioning of a computer or telematic system or in the unauthorised access to data, information or programmes contained therein, aimed at procuring the Company an unfair profit to the detriment of the State.

All information present on computers and other electronic instruments provided by the Companies, as well as company information present on the personal computers of the Recipients, is the property of the Company.

The Company is committed to ensuring that all confidential information acquired in the course of its normal business activities is treated in compliance with all the relevant laws in force in all the countries in which it operates, and with the best existing practices for the protection of the confidentiality of information and the treatment of sensitive data.

Operational rules

It is also forbidden to:

- install, download and/or use computer programmes and tools that make it possible to alter, counterfeit, falsely attest, suppress, destroy and/or conceal public or private computer documents;
- install, download and/or use computer programmes and tools that allow the unauthorised introduction of data processing or telematic systems protected by security measures or that allow unauthorised presence within such systems, in violation of the measures put in place by the owner of the data or programmes that are intended to be kept confidential;
- find, disseminate, share and/or communicate passwords, access keys, or other means of enabling the conduct referred to in the two previous points;
- use, retrieve, disseminate, share and/or communicate about the methods of use of equipment, devices or computer programmes designed to damage or interrupt a computer or telecommunications system;
- use, retrieve, disseminate, install, download, share and/or communicate the methods of use of equipment, devices or computer programmes aimed at illegally intercepting, preventing or interrupting computer or telematic communications, even if between several systems;
- destroy, damage, delete, make totally or partially unusable, alter or suppress data or computer programmes of others or seriously obstruct their operation;
- use, install, download and/or communicate techniques, programmes or computer tools that enable the modification of the server field or any other information related to it or that enables the identity of the sender to be hidden or changes the settings of the computer tools provided by the Company;
- use file sharing software.

All Recipients are also required to:

- comply with Company information protection policies and data protection requirements;
- properly use and protect access credentials to company systems and network;
- store sensitive, proprietary or confidential information in secure files on secure Company servers in line with the Company's internal regulations;
- protect all electronic devices used to conduct business on behalf of the Company.

6.4 USE OF NOTES, CREDIT CARDS, STAMP DUTY

General principles

The Company, sensitive to the need to ensure fairness and transparency in the conduct of business, requires that the Recipients comply with the regulations in force on the use and circulation of money, credit cards and stamps duty, and therefore severely punishes any conduct aimed at the illegal use and circulation of counterfeit credit cards, stamps duty, counterfeit money and notes.

6.5 INSTRUMENTS AND SIGNS OF RECOGNITION AND PROTECTION OF COPYRIGHTS

General principles

The Company safeguards intellectual property rights, including copyrights, patents, trademarks and signs of recognition, complying with the policies and procedures provided for their protection and respecting the intellectual property of others in the performance of all the activities of the Company, from whatever function they are carried out.

The Company prohibits any conduct that leads to the loss, theft, unauthorised disclosure or misuse of its own or others' intellectual property or confidential information. To this end, the Company undertakes to activate all the methods of preventive and subsequent control necessary for this purpose, ensuring compliance with the regulations on copyright, as well as on the protection of signs of recognition, such as trademarks and

patents. The Company also condemns the extraction, reproduction of data, public presentation, etc., of content taken from databases, as well as the use of the same for purposes other than those for which they were created and, in any case, contrary to what is permitted by the regulations on the protection of copyright.

The Company condemns any behaviour carried out for the purpose of illegally gaining possession of trade secrets, supplier lists and other information relating to the economic activity of Third Parties.

Operational rules

The unauthorised reproduction of software, documentation or other materials protected by copyright is prohibited and, at the same time, the Recipients of this Code undertake to comply with the restrictions specified in the licence agreements relating to the production/distribution of third-party products, or those stipulated with their own software suppliers.

The use or reproduction of software or documentation outside of what is permitted under such license agreements is also prohibited.

6.6 TERRORISM AND SUBVERSION OF THE DEMOCRATIC ORDER

General principles

The Company requires compliance with all laws and regulations that prohibit the carrying out of terrorist activities as well as subversion of the democratic order, therefore it also prohibits simple membership in associations with such aims.

The Company condemns the use of its resources for financing and carrying out any activity aimed at achieving terrorist objectives or subversion of the democratic order and undertakes to adopt the most appropriate control and supervisory measures in order to prevent any possible behaviour aimed at committing such crimes.

6.7 PROTECTION OF THE INDIVIDUALS

General principles

The Company condemns any behaviour aimed at committing crimes against the individuals, such as, for example, reducing and maintaining individuals to slavery or servitude, child prostitution, child pornography, possession of pornographic material, tourist initiatives aimed at exploiting child prostitution, etc., and undertakes to adopt the supervisory measures that are most appropriate to prevent the commission of such crimes.

The Company condemns any form of exploitation or reduction of people to a state of subjection, taking advantage of their state of need, and intends instead to ensure working conditions of the utmost decorum, respecting the requirements of the law and aimed at avoiding any situation of exploitation or serious danger.

6.8 ACTIVITIES AIMED AT RECEIVING STOLEN GOODS, MONEY LAUNDERING, USE OF MONEY, GOODS OR BENEFITS OF ILLICIT ORIGIN AND SELF-LAUNDERING

General principles

The Company conducts its business in full compliance with current anti-money laundering regulations and the provisions issued by the competent authorities.

In order to guarantee the transparency and correctness of commercial transactions, the Company undertakes to put in place preventive measures to avoid carrying out suspicious transactions to ensure legality and correctness.

Operational rules

All Recipients undertake to operate in such a way as to avoid involvement in operations that are also potentially suitable for favouring the laundering of money deriving from illegal or criminal activities.

Each Recipient who carries out, on behalf of the Company, operations and/or transactions involving sums of money, goods or other economically valuable utilities must act upon authorisation, providing on request all valid evidence for its verification at all times.

The Company undertakes to monitor the flow of funds from third-party financing companies/entities and/or on the occasion of capital increases by shareholders, in order to ensure correct identification of the source of the funds.

Collections must be made by bank orders and/or non-transferrable cheques

Payments must be made by bank orders and/or non-transferrable cheques, with limited exceptions regulated by internal procedures. In any case, it is forbidden to make cash payments equal to or greater than the legal threshold in the countries in which the Company operates.

All Recipients are also prohibited from accepting goods and/or services and/or other benefits for which there is no adequately authorised order/contract.

Finally, the personnel working on behalf of the Company are required to:

- verify as far as possible in advance the information available on users, counterparties, partners, suppliers, and consultants, in order to assess their reputation and the legitimacy of their activities before establishing, with them, any relationship involving obtaining goods or sums of money;
- behave in such a way as to avoid the establishment of any relationship, if there is even the slightest doubt, aimed at favouring the laundering of money deriving from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering regulations and with the internal control procedures prepared for this purpose.

6.9 TRANSNATIONAL ACTIVITIES AND PROTECTION AGAINST ORGANISED CRIME

General principles

The Company condemns any behaviour adopted, both in (Italian) national territory and at a transnational level, by persons who hold an apical or subordinate role, which may even only indirectly facilitate the implementation of criminal offences such as criminal association, mafia-type association and obstruction of justice.

The Company undertakes to activate all the preventive and subsequent control measures necessary for this purpose (verifiability, traceability, monitoring, segregation of duties, etc.), in order not to entertain relations with persons belonging to such associations.

The Company also undertakes to control any form of internal association in order to prevent the occurrence of internal associations aimed at engaging in unlawful conduct and using the means, resources and assets of the Company for such purposes.

Finally, the Company promotes development and legality within the territorial areas in which it operates; it therefore promotes participation in any protocols of understanding (or similar agreements) defined between public bodies, companies, trade associations and trade unions, aimed at preventing criminal infiltration.

Operational rules

Business relationships must only be maintained with reputable customers, collaborators, partners and suppliers who are engaged in legitimate business activities and whose income is derived from legitimate sources. To this end, rules and procedures are in place to ensure the correct identification of customers and the proper selection and evaluation of suppliers or partners with whom to work.

All the necessary control tools are adopted so that the decision-making centres act and deliberate according to codified rules and keep track of their actions (i.e., minutes of meetings, reporting mechanisms, etc.).

6.10 SAFEGUARDING OF COMPETITION

General principles

The Company and all Recipients undertake to comply with antitrust regulations (which prohibit conduct aimed at limiting competition) and to avoid any improper action against commercial counterparts (e.g., sabotage, falsification of technical, commercial and accounting documents and, in general, any fraudulent scheme).

6.11 SMUGGLING

General principles

All import and export activities must be carried out in compliance with the regulations in force and the provisions of the Consolidated Customs Act Presidential Decree no. 43 of 23 January 1973 and subsequent amendments and additions, adopting all the control and supervisory measures necessary to prevent any possible conduct aimed at smuggling goods.

Operational rules

Company representatives shall ensure maximum transparency in the management of all acts, requests and formal communications with the Customs Authorities. To this end, the involvement of persons with appropriate powers of representation of the Company is guaranteed.

Third Parties who manage customs operations and fulfilments on behalf of the company (i.e., couriers, customs agents) are required to comply with the contents of this Code of Ethics.

7 PRINCIPLES RELATING TO CORPORATE AND TAX OFFENCES

7.1 MANAGEMENT OF THE COMPANY'S ACCOUNTING, ASSET AND FINANCIAL DATA AND INFORMATION

General principles

The Company prohibits any conduct, by anyone, aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, addressed to shareholders and the public.

Operational rules

All the subjects called upon to draw up the aforementioned acts are required to verify, with due diligence, the correctness of the data and information that will then be incorporated for the drawing up of the aforementioned acts.

All items in the financial statements, the determination and quantification of which requires discretionary assessments by the relevant functions, must be supported by legitimate choices and appropriate documentation.

7.2 MANAGEMENT OF FISCAL ASPECTS

General principles

The Company implements a policy of non-evasion and is committed to implementing all necessary measures to comply with national and international tax and fiscal regulations. It promotes the adoption of all appropriate measures to prevent conduct that could give rise to significant tax risks.

The Company does not tolerate fraudulent behaviour aimed at tax evasion. Top Management's objectives are in no way commensurate with containing the fiscal impact on the Company's results.

Operational rules

All the subjects involved in the activities are required to ensure correct and truthful accounting entries, guaranteeing that no behaviour can compromise the transparency and traceability of the information in the financial statements and applying appropriate processes and controls. Falsification, omission or alteration of any information in the company's tax returns is prohibited.

7.3 RELATIONS WITH THE COMPANY'S CONTROL BODIES

Operational rules

The Company requires all personnel to behave correctly and transparently in the performance of their duties, especially in relation to any request made by shareholders, the Board of Statutory Auditors and other corporate bodies in the exercise of their respective control functions.

7.4 PROTECTION OF THE COMPANY'S ASSETS

Operational rules

It is forbidden to engage in any conduct aimed at causing damage to the integrity of the company's assets.

7.5 PROTECTION OF THE COMPANY'S CREDITORS

Operational rules

Any conduct aimed at reducing the share capital or merging with another Company or splitting up for the purpose of causing damage to creditors is prohibited.

7.6 CONFLICT OF INTEREST OF DIRECTORS

Operational rules

The director is obliged to disclose to the first useful shareholders' meeting and to the Board of Statutory Auditors, any interest, on their own behalf or on behalf of Third Parties, they may have in a certain transaction of the Company on which they are called to decide. Such notice shall be precise and accurate, i.e., it shall specify the nature, terms, origin and extent of the interest.

7.7 INFLUENCE ON THE SHAREHOLDERS' MEETING

Operational rules

It is forbidden to perform any act, whether simulated or fraudulent, aimed at illegitimately influencing the will of the members of the shareholders' meeting in order to obtain the irregular formation of a majority and/or a different resolution from the one that would otherwise have been adopted.

7.8 SPREADING OF FALSE NEWS

Operational rules

It is forbidden to spread false information, both inside and outside the Company, concerning the Companies themselves, their employees, consultants, collaborators and Third Parties working for it.

7.9 RELATIONSHIPS WITH PUBLIC SUPERVISORY AUTHORITIES

General principles

During audits and inspections by the competent public authorities, the corporate bodies and their members, the Company's employees, consultants, collaborators and Third Parties acting on behalf of the Company, must maintain an attitude of maximum availability and collaboration towards the inspection and control bodies.

Operational rules

It is forbidden to hinder, in any way, the functions of the Public Surveillance Authorities that come into contact with the Company through their institutional functions.

7.10 RELATIONSHIPS WITH BANKING OPERATORS

Operational rules

In the context of relations with banking operators, the Company's activities must conform to the following control principles:

- compliance with the roles and responsibilities defined by the company organisational chart and the authorisation system with reference to the management of relations with financial/banking operators;
- correctness and transparency in relations with banking institutions, in compliance with the principles of correct management and transparency;
- integrity, impartiality and independence, not improperly influencing the decisions of the counterparty and not requesting favourable treatment (prohibition of promising, disbursing or receiving favours, sums and benefits of any kind);
- completeness, accuracy and truthfulness of all information and data transmitted to the banking institutions.

7.11 RELATIONSHIPS BETWEEN PRIVATE INDIVIDUALS

Operational rules

The Recipients of this Code of Ethics are prohibited from:

- making donations of money or granting other advantages of any kind (promises of employment, use of company assets, etc.) to exponents (Top Management or subordinates) of other private companies in order to obtain any advantage for the Company;
- performing services or granting benefits of any kind in favour of representatives of business partners and/or consultants that are not adequately justified in the context of the relationship established with them;
- recognising fees or other advantages of any kind in favour of external Agents/Collaborators that are not adequately justified in relation to the type of task to be carried out and to local practices;
- making donations in money or recognising other benefits in favour of its suppliers, which are not adequately justified in the context of the relationship established with them or which may lead to ensuring an undue advantage for the Company;
- receiving advantages of any kind, exceeding normal business practices or courtesy, or in any case aimed at acquiring undue favourable treatment in the conduct of any business activity, in exchange for the payment of money or benefits of any kind.

8 METHODS OF IMPLEMENTATION, MONITORING AND DISSEMINATION

8.1 THE SUPERVISORY BODY

The Supervisory Body is responsible for checking and updating the Organisation, Management and Control Model and the Code of Ethics.

In carrying out its functions, the Supervisory Board has free access to the data and information of the company that are useful for carrying out its activities.

The corporate bodies and their members, employees, consultants, collaborators and Third Parties who act on behalf of the Company, are required to provide the utmost cooperation in facilitating the performance of the functions of the Supervisory Body.

Any report of conduct in violation of this Code of Ethics will be verified and ascertained by the SB in coordination with the competent internal functions and in line with the provisions of the Model and the Disciplinary System adopted by the Company.

8.2 SANCTIONS

Failure to comply with the principles contained in this Code may result in the application of the sanctions contained in the Company's Disciplinary System within the limits and according to the specific procedures provided for therein. The seriousness of the infringement will be assessed on the basis of the following circumstances:

- a) the timing and practical arrangements for implementing the infringement;
- b) the presence and intensity of the intentional element;
- c) the extent of the damage or danger as a result of the breach to the Company and to all employees and stakeholders of the Company;

- d) predictability of consequences;
- e) the circumstances in which the infringement took place.

Recidivism constitutes an aggravating circumstance and entails the application of a more serious penalty.

The Disciplinary System is an integral part of the Organisation, Management and Control Model adopted by the Company.

8.3 INTERNAL REPORTING

In the event of information regarding possible violations of the Code and/or the operating procedures that make up the Model or other events that could alter its value and effectiveness, each person is required to report to the Supervisory Body, using the following dedicated alternative channels of communication:

- e-mail address: organismo.vigilanza@alfasigma.com;
- mail address: Organismo di Vigilanza, Alfasigma S.p.A., Via dei Ragazzi del '99, 5, Bologna, Italy

The members of the Supervisory Board are required to treat the information they receive following reports of violations of the Code and/or the operating procedures, that make up the Model in accordance with the criteria of maximum confidentiality of the identity of the reporting party and the reported person, without prejudice to legal obligations and the protection of the rights of the Company and/or persons wrongly accused or in bad faith.

Alfasigma protects those who have provided information about possible violations of the Code and the Model from any pressure, intimidation and retaliation.

Failure to report a violation of this Code may be considered aiding and abetting the violation.

You may not conduct personal inquiries or report to anyone other than those specifically designated.

8.4 KNOWLEDGE AND DISSEMINATION

This Code is brought to the attention of the corporate bodies and their members, employees, consultants, collaborators and any other third party who may act on behalf of the Company. All the aforementioned subjects are obliged to learn its contents and respect its rules.

Any doubts regarding the application of this Code must be promptly submitted to and discussed with the Supervisory Body.

9 FINAL PROVISIONS

9.1 CONFLICT WITH THE CODE

In the event that even one of the provisions of this Code of Ethics conflicts with provisions set forth in internal regulations or procedures, the Code shall prevail over any of those provisions.

9.2 CODE AMENDMENTS

Any amendment and/or integration to this Code of Ethics must be made and approved in the same manner adopted for its initial approval.

10 DECLARATION OF ACKNOWLEDGEMENT AND ACCEPTANCE OF THE CODE OF ETHICS OF ALFASIGMA S.p.A.

The Declaration of acknowledgement and acceptance of the Code of Ethics must be made, by accessing the dedicated IT platform, each time the Code is updated.