

Cisano Bergamasco, 15/02/2023

WHISTLEBLOWING CODE OF ETHICS STATEMENT

The company considers the pursuit of proper ethical conduct to be an integral part of its business and a fundamental part of its "company policy".

The company considers it fundamental that every Employee and Collaborator shares and pursues the same objective and the same conduct.

The company believes that a capillary and detailed codification of conduct to be kept or not to be kept may be misleading, subject to misunderstandings, inevitably incomplete and therefore, in substance, ineffective and hypocritical.

The company therefore believes that the conduct of its Employees and Collaborators must comply with the Laws, common sense, loyalty, human and commercial correctness, a sense of personal responsibility and the interest of the Company, which is certainly a primary value, but never overriding the general interests of the Community and the environment.

Lastly, the company considers particularly reprehensible and totally rejects any active or passive behaviour of corruption or bribery.

The Company asks its Employees and its Collaborators to substantially and formally share the adherence to this document, committing themselves to directly inform the Company Management of any ethically incorrect behaviour that goes against the above. In this regard, the Company will guarantee total "Anonymity", and will consequently take steps to eliminate conduct that is in conflict with its Policy.

The Management

Marco Colombo

