



**CORPORATE CODE OF  
ETHICS – REVIEW OF  
01/12/2022  
(ANNEX "A" TO ORGANIZATION MODEL 231)**

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## 1. GENERAL PROVISIONS

### 1.1 FOREWORD

F.P. Trasmissioni Srl (hereinafter referred to as "**F.P. Trasmissioni**" or the "**Company**"), adopts this Code of Ethics, approved by the Board of Directors, and whose purpose is to clearly and transparently define the inspiring principles of its activity.

Recipients' compliance of the Code of Ethics is particularly important for the proper functioning, reputation and credibility of F.P. TRASMISSIONI in the social and professional context in which it operates.

This Code of Ethics is an integral part of the "Organisation, Management and Control Model" adopted by F.P. TRASMISSIONI pursuant to articles 6 and 7 of Italian Legislative Decree 231.

F.P. TRASMISSIONI therefore deems it necessary to expressly prohibit any criminal conduct that may cause the Company's involvement in criminal charges proceedings pursuant to Legislative Decree 231.

### 1.2 SCOPE AND RECIPIENTS OF THE CODE

This Code applies to the Company as a whole (directors and employees) and third parties with whom F.P. TRASMISSIONI has dealings (collaborators, suppliers, consultants), without prejudice to the enforcement of binding legal imperatives.

### 1.3 EFFECTIVENESS OF THE CODE TOWARDS DIRECTORS, EXECUTIVES, EMPLOYEES AND COLLABORATORS

Recipients are required to comply with provisions herein both in the dealings amongst them (so-called internal dealings) and dealing with third parties (so-called external dealings). In particular:

- in carrying out their guidance and coordination tasks (in particular, in drawing up strategies and objectives of the Company, as well as in any decision or action relating to corporate management) and with regard to their supervisory tasks, the **Directors** are bound to the principles set forth herein, both inside F.P. TRASMISSIONI and in relationships with third parties that come into contact with the Company;
- the **Department Supervisors** are bound to the principles set forth herein and require Employees and Collaborators to comply with them. To this end, the conduct of each Supervisor is a reference for Employees.
- For the purpose of this Code, Supervisors oversee the staff of their relevant departments, under their management, coordination or control and adopt the measures required to prevent any breaches whatsoever of this Code.

In particular, each Supervisor is required to:

- communicate the obligation of compliance with rules and regulations and with this Code to the Employees, in a clear, accurate and comprehensive manner;
- communicate to collaborators in an unequivocal manner that any breaches of this Code may lead to a breach of contract and/or a disciplinary offence, in accordance with current legislation;
- promptly report to the Supervisory Body any findings as well as any news referred to the Supervisor by collaborators regarding potential or actual breaches of this Code by any Employee or Collaborator;

- within the scope of the tasks assigned, implement or promote the adoption of suitable measures to avoid the continuation of violations and prevent retaliation against collaborators or any other Employee or Collaborator;
- the **Employees** are bound to the principles set forth herein e communications of relevant Department Supervisors.

In particular, compliance with this Code is an integral part of contractual obligations of Employees, also pursuant to and for the purposes of Article 2104 of Italian Civil Code.<sup>1</sup> In order to best share the Principles of the Code and the rules of conduct, employees are involved in specific training and information initiatives.

- **External collaborators** (suppliers, consultants, agents, etc.) are subject to the provisions hereof by including specific clauses, which establish the obligation to comply with the provisions<sup>2</sup>, in the relevant contracts. F.P. TRASMISSIONI also reserves, with a specific clause, the right to terminate the contract in cases of infringement of the provisions hereof by the third party.

F.P. TRASMISSIONI handles the dissemination to the Recipients, who sign acknowledgment upon receipt, of this Code of Ethics as well as the maximum intra-company dissemination thereof, by posting it in places accessible to all Employees, pursuant to and for the purposes of Article 7, paragraph 1, of Law no. 300/1970.

#### **1.4 DISCLOSURE OBLIGATIONS**

The Recipient that, in the performance of tasks, enters into contact with third parties, shall:

- inform, to the extent necessary, the third party about the obligations set out by the Code;
- demand compliance with obligations arising therefrom which directly concern the third party's activity;
- report any conduct by third parties that is contrary to this Code to the Supervisory Body.

### **2. CORE PRINCIPLES**

#### **2.1 COMPLIANCE WITH RULES AND REGULATIONS**

F.P. TRASMISSIONI recognizes compliance with national laws and regulations in force in the places where it operates as a fundamental principle.

Each Recipient must diligently acquire the necessary knowledge of the laws applicable to the performance of their duties, as in force from time to time.

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<sup>1</sup> “2104. *Employer diligence.* – The employee must use the diligence required by nature of the service due, by the interest of the company and by the higher interest of national production. Furthermore he/she needs to abide by the provisions for the execution and for the discipline of the work given by the entrepreneur and by the collaborators on whom he hierarchically depends.”

<sup>2</sup> Standard clause: “*The consultant/supplier/agent etc., in carrying out the activity covered by this assignment, undertakes to abide by and, therefore, to sign for acceptance, the rules contained in the Code of Ethics attached to this contract, of which they form an integral and substantial part. Violation of the rules referred to in the code of ethics by the consultant/supplier/agent is cause for termination of the contract, without prejudice to the right of F.P. TRASMISSIONI Srl. to compensation for damages deriving from the application of the penalties provided for by Legislative Decree 231/2001.*”

Individual or collective behaviour in the context of company operations must be in line with the company policies of F.P. TRASMISSIONI and with what is set out herein.

## **2.2 PROFESSIONAL ETHICS**

Recipients align their activities with the standards of professionalism required by the nature of the tasks and functions performed, devoting the utmost effort to achieving the objectives assigned to them and accepting the responsibilities associated with the exercise of their duties.

The Company promotes mutual collaboration between people involved in any capacity in the same project, work, or management process; therefore, the quality and efficiency of the company organization and the reputation of F.P. TRASMISSIONI are determined to a significant extent by the joint interaction of all recipients of this Code.

In no case, the pursuit of the interest of F.P. TRASMISSIONI can justify conduct by the Company's top management, directors, executives, employees and collaborators that is not in compliance with the laws in force and with the rules hereof.

## **2.3 MORAL INTEGRITY**

In carrying out their duties, Recipients maintain a conduct that is inspired by transparency and moral integrity and, in particular, by the values of honesty, correctness and good faith. Each Recipient recognizes and respects the personal dignity, privacy and personality rights of all individuals.

F.P. TRASMISSIONI rejects any behaviour that does not comply with the provisions hereof, even if such behaviour is carried out for the benefit or in the interest of the Company or, simply, in the conviction of acting in its interest or with the intention of securing an advantage.

## **2.4 TRANSPARENCY**

All conduct, operations and transactions decided or implemented by F.P. TRASMISSIONI and by persons acting in the name or on behalf of F.P. TRASMISSIONI must comply with the law, with professional correctness, with the principles of transparency, verifiability, consistency, and congruity, as well as duly authorised, documented and recorded.

Within the limits of their relevant competences, each Recipient keeps adequate documentation of each company operation performed, in order to allow, at any time, an easy check on the reasons and features of the operation in the phases of authorisation, execution, registration and verification of the operation itself.

## **2.5 CONFLICT OF INTEREST**

In carrying out their duties, Recipients avoid situations of conflict of interests with F.P. TRASMISSIONI, even when these do not correspond to manifest violations of the law. In turn, F.P. TRASMISSIONI prevents the onset and effects, direct and indirect, of situations of conflict of interest, whereby the persons acting in the name or on behalf of the Company are stakeholders.

Conflict of interest includes, but is limited to:

- (clear or hidden) participation of the Recipient in the activities of suppliers, customers, competitors
- using a job position for the pursuit of interests in conflict with those of F.P. TRASMISSIONI

- using kinship, friendship or emotional relationships for the pursuit of interests in conflict with those of F.P. TRASMISSIONI
- using information acquired in carrying out work activities for their own benefit or the benefit of third parties and in any case in contrast with the interests of F.P. TRASMISSIONI
- holding corporate offices or carrying out work activities of any kind whatsoever with customers, suppliers, competitors and third parties in general in conflict with the interests of F.P. TRASMISSIONI.

Any situation potentially generating a conflict of interest or in any case jeopardizing the Recipient's ability to make decisions in the best interests of the Company must be immediately notified by the Employee, by the Administrator to the Supervisory Body which guarantees maximum confidentiality on the acquired information. The Recipient has the obligation to refrain from carrying out acts connected or relating to this reported situation.

The rules on conflicts of interest of the members of the corporate bodies are ruled by Article 2391 of the Civil Code.<sup>3</sup>

### **3. EXTERNAL DEALINGS**

#### **3.1 BUSINESS GIFTS**

Recipients of the Code of Ethics are not allowed to offer or grant to third parties, and accept or receive from third parties, directly or through intermediaries, gifts, benefits or other gratuities (also in the form of sums in cash), except those of modest value due to normal commercial courtesy relations and, in any case, such as not to give the counterparty or the public opinion the impression of gifts aimed at acquiring or granting undue advantages, or such as to give the impression of illegality or immorality in any case.

The Recipient who receives gifts or offers of donations exceeding the modest value must immediately report it the Supervisory Body, in order to proceed with the appropriate measures.

In any case, it is forbidden for the Recipient to solicit the offer, acceptance or reception, gifts of any kind whatsoever, even if of modest value.

Any Recipient who – within the scope of their duties – enters into contracts with third parties which are binding for F.P. TRASMISSIONI, does not accept for personal use, nor does it hold or enjoy goods and services purchased for official reasons.

#### **3.2 BUSINESS ARRANGEMENTS AND AGREEMENTS**

F.P. TRASMISSIONI maintains business negotiations and relations with its business partners in compliance with the main principles set out herein and with the applicable laws.

Recipients are required to carry out their activities with business partners and contractual counterparties in compliance with the same principles. In particular, they must:

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<sup>3</sup> Article 2391.1 of the Civil Code states that “*the director must notify the other directors and the board of statutory auditors of any interest he/she has, on his/her own behalf or on behalf of third parties, in a given company transaction, specifying the nature, terms, origin and extent thereof; in the case of managing director, he/she must also refrain from carrying out the transaction, delegating it to the board.*” For all those who do not have the qualification of director, the general obligations of loyalty of the employee towards the employer will apply, as per Article 2105 of the Civil Code “*the worker must not deal with business, on his/her own behalf or on behalf of third parties, in competition with the entrepreneur, nor disclose information relating to the organization and production methods of the company, or use them in such a way as to cause damage to it.*”

- start relationships only with interlocutors (individuals or entities) who enjoy a respectable reputation and whose business ethics are similar to those of F.P. TRASMISSIONI;
- ensure the transparency of business arrangements and agreements and avoid signing secret agreements or agreements contrary to the law;
- avoid the establishment of personal relationships of favour, influence, suitable interference;
- to directly or indirectly affect the outcome of the relationship;
- promptly report to the Supervisory Body any behaviour by the partner or contractual counterparty that appears to be contrary to the law or the ethical principles referred to herein.

### **3.3 PRINCIPLES OF BEHAVIOUR WITH THE PUBLIC ADMINISTRATION**

F.P. TRASMISSIONI establishes relationships with the Public Administration and with public institutions (e.g. Ministries and their peripheral offices, Public Bodies, Bodies and Companies operating in the public service sector, Territorial Bodies, Local Bodies and independent Authorities) in compliance with the provisions of this Code, as well as of the By-Laws and the rules and regulations, having particular regard to the principles of correctness, transparency and efficiency.

By way of example but not limited to, the following behaviours are prohibited in dealings with representatives of the Public Administration:

- promise or make - even through a third party - payments in cash, goods in kind or other benefits/gifts, with the aim of promoting or favouring the interests of F.P. TRASMISSIONI;
- circumvent the previous prohibition through alternative concessions such as professional assignments, consultancy, advertising, sponsorships, employment opportunities, execution of works or services, etc.;
- hold or undertake such initiatives towards spouses, relatives or in-laws of public officials or public service officers;
- behave in any way intended to improperly influence the decisions of officials who deal or make decisions on behalf of the public administration (for example, favouring suppliers indicated by the public official in the purchasing process);
- access the information systems of the Public Administration in an unauthorized manner, to obtain or modify information for the benefit of F.P. TRASMISSIONI;
- exhibit false or altered data or omit due information, in order to orient the decisions of the Public Administration in one's favour;
- engage in any conduct, even through a third party, aimed at influencing the independence of judgment of the Public Official/Public Service Officer, so as to distract him/her from the exclusive service to the Public Administration, to violate the rules of discipline and its honour or the principles of good performance and impartiality of the Public Administration;
- in relations with third party competitors, promising or giving Public Officials/Public Service Officers, directly or through nominees, money or other benefits to obtain the handling of files in different order from the chronological order (or different order possibly provided for by the regulations in force) or the refusal of services due to competing third parties.

The prohibitions above are also intended to be extended to indirect relationships with representatives of the P.A. through trusted third parties.

### **3.4 DEALINGS WITH COMPETITORS**

Competitors are part of the set of variables that must be considered by an evolved company in its choices and development strategies. Therefore, this aspect must also be addressed, although still applying the relevant principles of the Code of Ethics.

Integrity, correctness, transparency, compliance with the law and lively competition are the hallmarks of action in the market for the commercial area of F.P. TRASMISSIONI.

To this end, the Recipients undertake to respect the principles of fair competition sanctioned by national and EU regulations, reserving the right not to enter into agreements with suppliers that may influence or compromise free competition in the reference market with their commercial behaviour.

The Company does not need Competitors' confidential information to be successful. Therefore, any requests by the Recipients or to the Recipients aimed at disclosing information on their former employers, clients or professional partners are not permitted if such disclosure may violate the obligations of confidentiality and fairness.

## **4. HUMAN RESOURCE**

### **4.1 EMPLOYMENT RELATIONSHIPS**

Each Recipient performs their duties diligently, collaborates with colleagues to achieve common results and is committed to creating a serene and rewarding work environment.

In the workplace, the Recipients maintain a conduct based on seriousness, order and decorum.

F.P. TRASMISSIONI works to ensure that there are no episodes of harassment or intolerance in internal working relationships.

### **4.2 CORPORATE INFORMATION AND DOCUMENTS**

Any information, document or other material known to the Recipients for reasons of corporate interest is the property of F.P. TRASMISSIONI. In particular, Recipients are not allowed to:

- disseminate confidential corporate news or information or the disclosure of which may be of benefit to third parties and/or harmful to the Company;
- issue copies of corporate documents (hard copy or electronic) to third parties without authorisation;
- provide information or technical knowledge on the security systems of plants or networks adopted by the Company, the disclosure of which may potentially cause damage to the Company;
- perform audio-visual, electronic, paper or photographic recordings or reproductions of company documents, except in cases where such activities are part of the normal exercise of assigned duties.

The obligation of confidentiality remains in force even after the termination of the relationship with the Company, in accordance with current legislation and the applicable contractual provisions.

### **4.3 USE OF CORPORATE ASSETS**

The corporate assets of F.P. TRASMISSIONI and, in particular, the plants and equipment located in the workplace, are used for service reasons, in accordance with current legislation.

Under no circumstances is it permitted to use corporate assets and, in particular, computer and network resources for purposes that are contrary to mandatory



provisions of the law, public order or morality, as well as to commit or induce the commission of crimes such as fraud information to the detriment of the State or public bodies, child pornography or the violation of human rights.

To this end, it is expressly forbidden to use computer resources for purposes other than those permitted by company security policies or to engage in unlawful conduct.

In particular, the following is not allowed:

- unauthorized access to a computer or IT system;
- the unauthorized possession and illegal dissemination of access codes to computer or IT systems
- the dissemination of equipment, devices or IT programs aimed at damaging or interrupting a computer or IT system;  
the unlawful interception, impediment or interruption of computer or IT system;
- damage to information, data and IT programs and IT or computer systems.

F.P. TRASMISSIONI also precludes the use of software that is not expressly authorized or that is unlicensed or of illegal origin.

## **5. BUSINESS POLICY**

### **5.1 ENVIRONMENT PROTECTION**

F.P. TRASMISSIONI plans the development of its activities by making the most of natural resources whilst preserving the environment.

The environmental policy is based on an awareness-raising activity that involves all collaborators, starting from simple but very useful behaviours, such as the separate collection of some materials (toners, batteries, paper, plastic, etc.) and the attention to energy saving.

The Recipients of this Code of Ethics are required to develop in-depth knowledge of the issues of global sustainable development and biodiversity conservation and to take initiatives to protect the environment in daily life, in the workplace and in society, and must cooperate in the implementation of actions and projects promoted to protect the environment.

Recipients are also required:

- to help, within their competence, fulfil the obligations envisaged for the protection of the environment;
- to always evaluate the effects of conduct in relation to the risk of damage to the environment;
- in accordance with training and experience, as well as with the instructions and means provided or prepared, not to adopt behaviours that could cause damage to the environment;
- to adopt measures aimed at preventing the production and reducing the harmfulness of waste;
- to ensure the protection of the soil and subsoil, the atmosphere, the conservation of the territory as well as the protection of surface, marine and underground waters.

## **5.2 SAFETY IN THE WORKPLACE**

F.P. TRASMISSIONI considers the dissemination of a culture of safety to be particularly important.

It seeks to reduce the risks to the physical integrity of all its Collaborators, also through information and training as a tool for accountability and guarantee of protection of health and safety in the workplace in compliance with the provisions of the applicable legislation.

F.P. TRASMISSIONI undertakes to abide by and keep the work environment absolutely compatible with the protection of the health of its employees, trying not to create conditions of discomfort, even psychological, whilst opposing any discriminatory or persecutory attitude. The appropriate departments take steps to ensure that the environmental conditions are always monitored and within the normal range, as well as compliant with the relevant rules and regulations in force, adopting all the tools and checks that are necessary for this purpose.

F.P. TRASMISSIONI undertakes to carry out adequate training, information and training on safety and health matters, to raise awareness in its employees and collaborators relating to all the risks connected to the exercise of the work activity and to promote responsible behaviour.

In particular, the Recipients must:

- take care of one's own health and safety and that of other people present in the workplace, affected by the effects of one's actions or omissions, in accordance with the training, instructions and means provided by the employer;
- contribute, together with the employer, managers and supervisors, to the fulfilment of the obligations envisaged for the protection of health and safety in the workplace;
- observe the provisions and instructions given by the employer, managers and supervisors, for the purposes of collective and individual protection;
- correctly use work equipment, dangerous substances and preparations, means of transport as well as safety devices;
- use the protective devices made available appropriately;
- take care of the personal protective equipment made available, without making any changes on their own initiative and reporting any defects or inconveniences to the employer or manager or person in charge;
- immediately report any dangerous condition of which they become aware.

The integrity of human resources is for F.P. TRASMISSIONI a core value: in no case or way are harassment and/or attitudes allowed or tolerated, both explicit and allusive, which may even minimally disturb the sensitivity, harm the dignity, respect and integrity, both physical and psychological of the human resources.

## **5.3 PERSONAL DATA PROTECTION**

Pursuant to Article 4, paragraph 1, letter b) of the General Data Protection Regulation 679/2011, 'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In carrying out its activities, F.P. TRASMISSIONI processes personal data of Recipients and third parties and endeavours to guarantee that the Recipients make

sure, within the scope of their functions, that the data being processed are managed in compliance with current legislation as well as with the company procedures that are applicable from time to time.

## **6. ACCOUNTING AND INTERNAL CONTROLS**

### **6.1 ACCOUNTING RECORDS**

F.P. TRASMISSIONI checks that the bookkeeping and the accounting records take place according to principles of truth, completeness, clarity, precision, accuracy, in accordance with current legislation.

For each operation, adequate supporting documentation must be kept in deeds, such as to allow easy accounting recording, the reconstruction of the transaction and the identification of any responsibilities.

Each Recipient is required to collaborate in ensuring that every accountable transaction is properly and timely recorded.

The presentation of adequate supporting documentation is also required to the Recipients when compiling bills of costs, for which reimbursement is requested.

### **6.2 INTERNAL CONTROLS**

Within the limits of their functions and the tasks assigned to them, each Recipient is responsible for the definition and correct functioning of the control system; in particular, among other things, it must keep adequate documentation of each operation carried out, so that the reasons and characteristics of the operation can be verified at any time, in the phases of authorisation, execution, registration and verification of the operation.

### **6.3 DEALINGS WITH AUDITORS**

F.P. TRASMISSIONI bases its relations with the Auditors on the utmost diligence, professionalism, transparency, collaboration, availability and in full compliance with their institutional role, promptly and timely implementing the regulations and any required obligations.

The data and documents are made available in a timely manner and in a clear, objective and exhaustive language in order to provide complete, faithful and truthful information.

### **6.4 FISCAL AND TAX POLICY**

F.P. TRASMISSIONI complies with tax and fiscal legislation and guarantees the transparency and control that book and tax entries are duly kept and recorded, collaborating with the financial administration in the event of inspections and audits.

The Company prohibits to:

- include in the declaration and account for invoices or other documents that do not exist at an objective or subjective level;
- include in the declarations and record invoices or other documents with a higher value than the real one;
- hide or destroy accounting records or omit to report accidental events to the competent bodies that may lead to the destruction or deterioration of accounting records;
- use money, goods or other benefits deriving from crimes committed by third parties, or even by top management or employees of F.P. TRASMISSIONI, in economic or financial activities;
- evade income or value added taxes, within the context of a cross-border fraudulent system, indicating assets for an amount lower than the actual amount or non-existent liabilities in the annual returns relating to said taxes;

- evade income or value added taxes, in the context of a fraudulent cross-border system, by failing to present, while being obliged to do so, one of the declarations relating to said taxes;
- avoid paying sums due, in the context of a fraudulent cross-border system, using undue credits as compensation.

## **7. PROHIBITION OF CONDUCT AT RISK OF 231 OFFENCE**

In pursuing the fundamental principle of compliance with the law, F.P. TRASMISSIONI expressly and categorically prohibits conduct that constitutes a violation thereof, including, in particular, the unlawful conduct envisaged by Legislative Decree 231/2001.

In addition to what is provided for elsewhere in this Code, the conduct described below is expressly prohibited:

### **7.1. LEGAL PROCEEDINGS**

In civil, criminal or administrative proceedings involving F.P. TRASMISSIONI, the Recipients must not undertake (directly or indirectly) any action that could unduly favour or damage one of the parties involved.

### **7.2. CORPORATE MANAGEMENT**

In the exercise of corporate management, the Directors and their collaborators must not:

- return contributions to shareholders or release them from the obligation to make them, except in cases of legitimate reduction of the share capital, or carry out reductions in the share capital or mergers with other companies or demergers, in breach of statutory provisions protecting creditors;
- distribute profits or advances on profits not actually earned or allocated by law to reserves, or distribute reserves that cannot be distributed pursuant to the law;
- form or fictitiously increase the Company's capital through transactions that are not permitted by law.

### **7.3. RESULTS OF CORPORATE BUSINESS**

In drawing up the financial statements or other similar documents, the Directors and all Recipients involved in this activity must:

- represent the statement of income, balance sheet and financial position truthfully, clearly and completely;
- in addition to the provisions of paragraph 6.3, facilitate in any way the performance of the control or auditing activities legally assigned to the shareholders, to other corporate bodies or to the auditors;
- submit deeds and documents to the shareholders' meeting that are complete and correspond to the accounting records;
- provide the supervisory bodies with accurate and complete information on the statement of income, balance sheet and financial position.

### **7.4. ANTI-MONEY LAUNDERING**

Recipients must take all the appropriate tools and safeguards to guarantee the transparency and fairness of commercial transactions.

They are required to ensure that:

- cash receipts/payments are not made;
- the assignments conferred to any service companies and/or natural persons who look after the economic/financial interests of the Company are drawn up in writing, with an indication of the contents and the agreed economic conditions;

- the competent functions ensure that the regularity of payments to all counterparties is checked and that the correspondence between the person to whom the order is made out and the person who collects the relative sums is always verified;
- control of financial flows is carried out;
- the evaluation criteria of the bids are established;
- with reference to the commercial/professional reliability of suppliers and partners, all the information necessary for a correct assessment of the relevant profile is requested and obtained.

## **7.5 INDUSTRIAL AND INTELLECTUAL PROPERTY**

F.P. TRASMISSIONI complies with the legislation on trademarks, patents and copyright. Therefore, the use, for any reason, of products and/or semi-finished products with altered or counterfeit trademarks or signs is not permitted, as well as the manufacture, marketing and dissemination of products already patented by third parties or which bear distinctive signs that are misleading as to their origin, the place of origin or quality of the product. The protection of intellectual property is particularly important, and therefore any abusive dissemination, reproduction, use, sale, for any purpose, for any use and with any tool is prohibited.

Also, in the context of the use of graphic materials (photographs, graphic representations, diagrams, etc.) used for communication and marketing needs, F.P. TRASMISSIONI carries out the necessary preliminary checks in order not to violate the copyright of others.

F.P. TRASMISSIONI precludes the use of software not expressly authorized or unlicensed or of unlawful origin.

## **8. IMPLEMENTATION OF THE CODE**

### **8.1 DUTIES OF THE SUPERVISORY BODY**

In order to pursue compliance with the principles set out herein, the Supervisory Body of F.P. TRASMISSIONI promotes:

- maximum dissemination and awareness of this Code;
- its uniform interpretation and implementation;
- the conduct of internal investigations regarding reports of violations of this Code and the application of sanctions in the event of violations ascertained in accordance with current legislation;
- the prevention and repression of any form of retaliation against those who contribute to the implementation of this Code;
- periodic updating of this Code, on the basis of needs that arise from time to time, also in the light of the activities set out above.

### **8.2 CLARIFICATIONS, COMPLAINTS AND NEWS**

Please refer to the following contact details of the Supervisory Body to send:

- any reports of potential or actual violations of this Code of Ethics and company procedures;
- any requests for clarification if there are doubts about the compliance of the conduct to be reported with regulations or requirements that are dubious or difficult to understand:

Organismo di Vigilanza

F.P. Trasmissioni Srl  
odv@fptrasmissioni.com

The SB will evaluate each report, whilst ensuring the confidentiality of the identity of the reporting person. Reports submitted in good faith will not result in negative actions against the reporting person even if they should turn out to be unfounded.

### **8.3 WHISTLEBLOWING**

Persons required to comply with the Code of Ethics F.P. TRASMISSIONI who become aware of violations are required to promptly report the violation to the SB of F.P. TRASMISSIONI to the email address [odv@fptrasmissioni.com](mailto:odv@fptrasmissioni.com)

F.P. TRASMISSIONI provides provisions for the protection of the whistleblowers, and precisely:

- the prohibition of retaliatory or discriminatory acts against the whistleblower for reasons connected, directly or indirectly, to the report;
- the provision, in the disciplinary system, of sanctions against those who violate the measures to protect the whistleblower, as well as those who make reports that turn out to be unfounded with wilful misconduct or gross negligence.

### **8.4 VIOLATION OF THE CODE**

Failure to comply with the provisions contained in the Code of Ethics may result in disciplinary and/or contractual sanctions.

No unlawful behaviour or conduct otherwise in breach of the provisions of the ethical rules, deemed illegitimate or dishonest may be justified or considered less serious, even if undertaken in the interest or to the benefit of F.P. TRASMISSIONI.

The sanctions, in compliance with the law and the collective agreements in force, will be proportionate to the seriousness of the infringements committed. In any case, F.P. TRASMISSIONI reserves the right to take appropriate legal action if the object of the violations should lead to tangible and intangible damage to the Company in terms of damage to the corporate image on the market and in civil society.

The failure to apply the rules of the Code of Ethics by collaborators, consultants, suppliers, customers, partners, agents, counterparts in contractual relationships and all those who, natural or legal persons, even temporarily establish relationships with F.P. TRASMISSIONI in pursuit of common goals shall constitute grounds for the interruption of the collaboration relationship with F.P. TRASMISSIONI.

### **ACKNOWLEDGEMENT STATEMENT**

I \_\_\_\_\_, born in \_\_\_\_\_,  
residing in \_\_\_\_\_, in the capacity of \_\_\_\_\_  
of \_\_\_\_\_, hereby declare that I have received a copy of the  
corporate Code of Ethics of F.P. Trasmissioni Srl, and I have acknowledged the  
provisions stated therein.

I herewith undertake to abide by them and to promote their compliance among  
Colleagues and Collaborators.

\_\_\_\_\_,  
[Place] [Date]

\_\_\_\_\_  
[Signature]