



1. Purpose

The Code of Ethics establishes general rules in terms of Compliance and ethical conduct within FONDERIA MORINI, as well as general business principles, and our fundamental values and identity. It defines the standards for our conduct, and establishes the objectives for which we work and which see the enhancement of the professionalism of all those who contribute daily to making FONDERIA MORINI a unique reality in its sector: employees, collaborators, suppliers, customers, and contractors whose work we make use of in our continuous quest for improvement in all areas of expertise. The Code of Conduct must be complied with by the Board of Directors, Management, the Managers and all other employees, including company consultants in all their activities.

2. Compliance with rules and regulations

Violations of the law lead to the imposition, by the competent Judicial Authority, of sanctions related to any violation committed, as well as to the disbarment of FONDERIA MORINI from operating in the public sector, while also exposing the Company to liability for compensation for damages related to statutory and regulatory violations, with evident negative repercussions not only in terms of economics, but also when it comes to image and reliability in the national and international market of operations.

FONDERIA MORINI has formally adopted this Code of Ethics to clearly define the set of values that it recognizes, accepts, shares and considers fundamental to ensure the good functioning, reliability and reputation of the Company.

FONDERIA MORINI monitors compliance with the Code of Ethics with adequate information, prevention and control tools, ensuring the transparency of all operations and behaviors implemented, intervening, if necessary, with corrective actions.

The Code of Ethics is an integral part of the Management system the Company adopted. FONDERIA MORINI will terminate any relationship with parties that do not intend to align themselves with the principle of legality, a fundamental value for the Company to comply with in all its business activities.

3. Ethical Conduct

Ethical conduct means respecting the rules and provisions of the law. FONDERIA MORINI has been committed daily to enhancing the professionalism of all the people whose skills it leverages to pursue the aim of maximum customer satisfaction through the guarantee of reliability over time of products and services provided, in strict compliance with all regulations, also, and above all, in terms of the environment, as well as safety and health in the workplace. FONDERIA MORINI makes every effort to ensure that its managers, employees and collaborators behave ethically in the execution and completion of all commercial and corporate activities within their competence and delegated to them. **Ethical conduct** also means identifying and respecting the spirit of our internal needs, avoiding any attempt to circumvent them.

GENERAL ETHICAL PRINCIPLES

VALUE OF THE PERSON: the value of the person represents a fundamental principle at the center of the daily action of FONDERIA MORINI, which is committed to listening and dialogue as tools for continuous improvement both with respect to the proposed solutions to customers and to the enhancement of the personal qualities and skills of its employees and collaborators.

HUMAN RIGHTS: The primary value pursued by FONDERIA MORINI is full respect for human rights, the implementation of which is promoted within the Company's sphere of influence. FONDERIA MORINI undertakes not to carry out, even indirectly, any abuse or violation of human rights (also understood as racism, xenophobia, slavery, harassment and discrimination).

4. Recipients of the Code of Ethics

The recipients of this Code of Ethics are:

- All subjects who operate within FONDERIA MORINI to achieve Company objectives.
- All collaborators, external consultants and business partners (including Suppliers) are required to comply with this Code of Ethics when conducting business and commercial negotiations.

5. Corruption

FONDERIA MORINI does not tolerate corruption. Influencing decisions that can be taken by public or private entities, promising or granting benefits and advantages of any kind, is prohibited by law and is criminally sanctioned. FONDERIA MORINI is committed to fighting corruption and preventing any behavior that may even give the slightest impression of corrupt action, and, in this context, it ensures transparency in all activities and practices. Each operation and transaction is correctly recorded, authorized, verified and verifiable, legitimate, coherent and congruous, according to current regulations and internal procedures.

FONDERIA MORINI acts decisively wherever there is suspicion of collusion or corruption, adopting the most appropriate measures.

Gifts, freebies and other benefits, even if only promised, to customers, suppliers, administrators, collaborators, employees, suppliers, public officials or public service representatives are permitted only when they are adequately authorized and documented, of modest value and, in any case, such that they cannot be interpreted by third parties as aimed at acquiring any type of advantage in an improper or illicit manner. In any case, gifts, freebies and other benefits must never in any way be intended or aimed at influencing or rewarding an act of the recipient's office.

Every manager, employee or collaborator of FONDERIA MORINI must refrain from accepting gifts or freebies exceeding normal courtesy practices, as well as from accepting, for themselves or others, any other benefit or advantage, even if only in the form of a promise, aimed at compromising their independence of judgement, impartiality and operational correctness. Any manager, employee and collaborator who, as the result of activities performed for FONDERIA MORINI, receives, even at his/her own home, gifts or other forms of benefit or utility, in violations of the provisions set forth above, must undertake any and all appropriate initiative in order to refuse said gift, benefit or utility, and inform his/her own supervisor or contact person for appropriate evaluations and actions. Employees are not authorized to accept any discounts, special rates or other privileges that may be granted due to their relationship with FONDERIA MORINI, if such privileges are likely to influence their professional decisions.

**6. Money laundering**

FONDERIA MORINI is committed to fighting money laundering and has adopted the necessary precautionary measures to such end. These measures are also aimed at adequately raising the awareness of FONDERIA MORINI employees and collaborators so that, in the exercise of their respective duties and functions and in commercial relationships, they behave in full compliance with national and international legislation aimed at combating money laundering.

7. Fair competition

FONDERIA MORINI is committed to ensuring fair competition. Customers choose the products and services offered by FONDERIA MORINI for their high quality and high processing standards. FONDERIA MORINI refuses to be party to any illegitimate, illicit or inadmissible agreement or agreements restrictive or disruptive of trade (for example, counterfeiting, exchange of information relevant to competition, use of supplies by suppliers included on black-lists or subject to embargo restrictions).

8. Fair employment and social interaction

FONDERIA MORINI fights all forms of illegal employment and exploitation of workers (for example, child labor and human trafficking and illegal immigration). Illegal employment weakens the labor market and the social security system. It jeopardizes employment and prevents the creation of new jobs, negatively impacting the national economy. The violation of workers' rights, recognized by the Charter and by national and supranational legislation cannot in any way be reconciled with our ethical values hinging on the full and absolute respect of these fundamental rights, including suitable working hours, fair and equitable pay, and freedom to join trade unions. FONDERIA MORINI adheres to principles of respect in mutual relationships. All employees have equal opportunities when hired and in the further growth of their careers within FONDERIA MORINI. Discrimination in any form is prohibited, whether based on gender, age, race, religion, political and trade union affiliation, language, ethnicity, sexual orientation or health status. In particular, no one may be harassed or disadvantaged due to their nationality, gender, sexual orientation, religious or ethical beliefs, disability or age. FONDERIA MORINI expects all its employees to contribute to a productive work environment by treating each other with mutual respect, tolerance and consideration. Employees are encouraged to report all incidents of a hostile work environment and must do so without fear of retaliation from the Company.

9. Collaborators and the protection of Health and Safety

Employees who give their contribution to the growth of FONDERIA MORINI are held in very strong consideration by Management which, in their selection, evaluates without prejudice or ad hoc processes, on the basis of equal opportunities informed by the pairing of a candidate's profile and the job requirements. Employees are hired on the basis of a regular employment contract; any form of irregular work is not tolerated. Upon hiring, each employee receives all the information relating to the tasks to be carried out, working hours, regulatory and remuneration elements, as governed by the CCNL (National Collective Labor Agreement) and the regulations and procedures applicable to each job description. FONDERIA MORINI protects the moral integrity of its employees and guarantees working conditions that respect the dignity of the person. It protects workers from acts of psychological violence, and counteracts any attitude or behavior that is discriminatory or harmful to the person and their beliefs. Sexual harassment is not permitted, and behavior or speech that may disturb the person's sensitivity must be avoided. The employee who believes to have been the subject of harassment or has been discriminated against for reasons related to age, sex, sexuality, race, health, nationality, political opinions and religious beliefs, etc., can report the incident to Management, which will determine if the Company's Code of Ethics has been violated. Everyone is equally afforded the same opportunities to express their professional potential. Compensation to be paid must be commensurate with the service indicated in the contract and payments cannot be made to a person other than the contractual counterparty. The Company undertakes to comply with the legal requirements regarding safety in the workplace through a correct analysis of applicable risks. We ask all employees and non-employees who may have an impact on safety to comply with the provisions of the internal rules regarding safety in the workplace (Risk Assessment Document and Internal Procedures), and promptly report any type of anomaly that could jeopardize the health and safety of workers operating within the scope of FONDERIA MORINI's activities.

10. Suppliers

FONDERIA MORINI relies upon competent and loyal suppliers who "team-up" with internal employees in a relationship of indispensable and mutual loyalty, transparency and collaboration. In the event that the supplier does not carry out its activity according to the principles of this code, FONDERIA MORINI will take the measures it deems appropriate, to the point of precluding any other opportunities for collaboration. Relationships with suppliers are subject to constant monitoring by the Administrative and Quality manager of FONDERIA MORINI. A contract entered into with a supplier must always be based on extremely clear and confidential relationships. The behavior of anyone who tries to appropriate the benefits of the collaboration of others, exploiting positions of strength, is unethical.

11. Supply chain

In its relations with suppliers, at all levels of the supply chain, FONDERIA MORINI requires compliance with the principles of the Company Policy and of this Code of Ethics.

12. Creation of shared value

We are committed to reconciling economic objectives with social and environmental ones, generating value for the Company, stakeholders and suppliers, enhancing positive outcomes and avoiding or minimising negative ones.

**13. Efficient use of resources and environmental protection**

FONDERIA MORINI promotes the efficient use of energy resources and the reduction of greenhouse gas emissions, through the implementation of high-energy efficiency technologies and the promotion of renewable sources. In order to minimise the impact of our activities on the environment, we encourage the adoption of an LCA (life cycle assessment) logic in all processes, starting from the design phases, with particular attention to water consumption, waste and the prevention of soil pollution. We encourage our suppliers to improve their environmental performance and, where possible, direct and support them in their improvement process.

14. Respect for human rights

FONDERIA MORINI is committed to ensuring respect for human rights in our activities, operating within the reference framework of the United Nations Universal Declaration of Human Rights, and among e-business partner suppliers, contributing to the creation of a responsible supply chain. We reject any form of illegal work, and promote policies aimed at the psychophysical well-being of personnel.

15. Sensitive data and information protection

FONDERIA MORINI collects and processes the personal and sensitive data of its employees and of the natural and/or legal persons with whom it entertains relations. Such processing, where applicable, is performed with the consent of the data subjects, and takes place with the methods and limits established by the GDPR EU regulation 2016/679. These standards also provide for the prohibition, without prejudice to the cases provided by law, to communicate/disseminate personal data without the prior consent of the data subjects, and establish the rules for the control, by each collaborator, of the rules for the protection of privacy.

FONDERIA MORINI's employees have access to information relating to other entities and companies. Access, use and disclosure of such information without authorization could damage FONDERIA MORINI or the third party; employees are therefore prohibited from accessing, using or disclosing such information without the necessary authorization and in full compliance with the requirements provided by the third party, which is the owner of such information.

16. Conflict of interest

A conflict of interest generally refers to any activity that is or appears to be in conflict with the best corporate interests of FONDERIA MORINI. Any conflict, even if only apparent, must be immediately reported to Management. Employees may not work for or provide consultancy directly or indirectly to a competitor, or engage in activities that are deemed to be in competition with the economic interests of FONDERIA MORINI, including working for a supplier; they cannot use FONDERIA MORINI's customer lists or contacts to market their own or third-party goods and services, even if they are not in competition with the products or services promoted by FONDERIA MORINI. Employees must avoid any material financial interest in the Company where such interest may be in conflict with the corporate interests of FONDERIA MORINI. They must also promptly report any situation that is deemed to be of strong personal interest to themselves or their immediate family members.

17. Protection and use of company assets

FONDERIA MORINI owns both tangible and intellectual assets. Employees and collaborators are required to protect assets entrusted to them and to safeguard all others. Any loss or risk of loss of Company assets must be reported by employees to Management. Company communications systems, including Internet connections, must only be used to perform company activities or for other instrumental purposes authorized by one's supervisor, the relevant Company directive or related instructions. Employees must take care to always follow the instructions on the use of the passwords and codes assigned to them.

Furthermore, the Company's intellectual assets, which are of various kinds and include, among other things, software programs and technical documentation, must be treated with due care. Intellectual assets created by employees in the course of their work are transferred to FONDERIA MORINI in accordance with current laws and/or the respective employment contract or other agreement, without prejudice to any exceptions provided for by international conventions, local laws or particular agreements. Upon termination or resignation, all goods owned by the Company must be returned, including documentation and media containing FONDERIA MORINI information. Former employees continue to be subject to restrictions on the use and disclosure of Company-owned information.

18. Incentive, implementation, supervision and control systems

According to the rules included in this Code, everyone is responsible for their actions and conduct. Furthermore, since Top Management is responsible for directing the actions of others and setting an example for employees, together with employees, collaborators and suppliers, it must be well aware of the values expressed in this document. The training programs and information events will provide the appropriate tools regarding the content of the Code of Ethics and the related guidelines.

No one has the authority to require anyone to violate this Code of Ethics; any such attempt is subject to immediate disciplinary action. Compliance with the rules of the Code of Ethics represents an essential part of employees' contractual obligations. In the event of a violation of one of the rules provided herein, Management will take the appropriate measures as promptly as possible in compliance with current laws and the regulations established by the Sanctioning System.

The employee who reports (alleged) violations of the Code of Ethics or related guidelines must not fear retaliation, even by virtue of the legislation (Whistleblowing). Fonderia Morini also implements a system aimed at preventing reports from being merely slanderous or denigrating.

Disciplinary sanctions for third parties (natural or legal persons) which have contractual relationships with each Group company consist of the termination of existing contractual relationships, without prejudice to the right to compensation for damages.



19. Management of reports and Whistleblowing

In compliance with current legislation on Whistleblowing, any form of retaliation, discrimination or penalization against those who make reports in good faith is prohibited. Fonderia Morini reserves the right to take any action against anyone who makes untruthful reports in bad faith. Reports can be communicated or transmitted according to the following criteria:

1) By regular mail	Fonderia Morini via Madonna di Genova 41 48033 Cotignola RA (managed by the Administration and HR Director)
2) E-mail	Fonderia Morini info@fonderiamorini.com (managed by the CED - Data Processing Center)
3) ANAC website	link to the ANAC website https://whistleblowing.anticorruzione.it/#/

In the event that, according to the whistleblower, reporting through the internal channel (1 and 2) does not lead to any results, pursuant to the indications of Legislative Decree 24/2023, it is possible to contact the following link (ANAC website <https://whistleblowing.anticorruzione.it/#/>), in furtherance of any unresolved matter.

Reports are managed by a team comprising the CEO, the Administration and Human Resources Manager and the Quality Manager.

Without prejudice to legal requirements, the identity of the whistleblower cannot be revealed without his/her express consent, pursuant to Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR).

20. Training

Training programs and information events will provide the appropriate tools regarding the content of the Code of Ethics and the related guidelines.

21. Approval

Signature and/or stamp for Approval

Date

CEO, LUCA MORINI

31/01/2024

