



Arvedi CODE OF CONDUCT



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PREAMBLE

The Code of Conduct of the Arvedi Group ("Group") describes the values we share and the way we want to work together, now and in the future. It sets out a clear vision that we must strive to realize in order to secure long-term business success, based above all on our common values such as personal responsibility, openness, transparency as well as legal and ethical compliance play a vital role in this.

The role of responsible corporate citizen as described in the mission statement also involves making an active commitment to sustainable development, which we support by subscribing to the ten principles of the United Nations Global Compact. We are also committed to the United Nations Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO).

This Code of Conduct summarizes the main principles and rules governing our actions as well as the standards we set ourselves in our dealings with business partners and stakeholders.

For a long lasting business relationship, the Group considers an essential prerequisite that suppliers accept this Code of Conduct.

In the event of proven violations or unsubstantiated suspicions, the concerned Group Company ("Company") will agree with its supplier to implement sustainable corrective measures within a reasonable period of time in order to prevent new or further violations. The Company also reserves the right to resolve without notice individual contractual relationships or all contractual relationships with suppliers who, demonstrably, do not comply with the Group's Code of Conduct or fail to carry out agreed corrective measures.

Together we are responsible for the reputation of our company. The misconduct of individuals can cause all of us significant damages.





CONDUCT TOWARDS COLLEAGUES AND EMPLOYEES





1. Conduct towards colleagues and employees

Equal treatment and non-discrimination

A culture of equal opportunities and mutual trust and respect is of great importance to the Group, promoting equal opportunities for employees. We appreciate all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion or world view.

Human and labor rights

The Group respects internationally recognized human rights and support their observance. It strictly rejects all forms of forced and child labour. It recognises the right of all employees to form unions and employee representative bodies on a democratic basis, inspired by an open and constructive dialogue characterised by mutual respect. The right to appropriate compensation is recognized for all employees.

The Group also ensures the protection of employees concerning holidays, parental leave, working hours and personal privacy.

Occupational health and safety

he safety and health of our employees are a corporate objective of equal standing with the quality of our products and our commercial success.

Occupational safety and health protection are an integral part of all business processes and are included from the outset – starting in the planning phase – in all technical, economic and social considerations.

All employees shall promote safety and health in their work environment and comply with the health and safety regulations. All managers are obligated to instruct and support their employees in meeting this responsibility, ensuring adequate and continuous training and providing them with the necessary protective equipment.

The same safety standards as for Companies' employees shall apply to employees of subcontractors. This is taken into account in







2 CONDUCT IN BUSINESS





Compliance with law

Compliance with law, rules and regulations is for us an essential basic principle of responsible business conduct. We adhere to legal prohibitions and requirements at all times, even if this involves short-term business disadvantages or difficulties for the Company or individuals.

Fair competition

Our conduct on the markets is based on the compliance commitment. The Group stands for technological competency, innovation, customer orientation and motivated, responsible employees. These factors are the basis of our high reputation and the long- term economic success of the Group in global competition.

Corruption and antitrust violations threaten these success factors and are not tolerated (Zero Tolerance). Bribes, also through contractual relationships with agents, intermediaries and advisors, are not a means of winning business. The Group does not tolerate bribery and ensure compliance with all United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions against corruption, and with all governing anti-corruption laws.

In particular, under no circumstances it is permitted (in person or through a third party) to offer, grant or accept unlawful payments, inducements, favours or other advantages (including inadequate invitations and gifts) in order to realise business opportunities, to expedite or facilitate a public act or in any other context related to the Companies' business activities.

The Group has also taken wide- ranging measures to ensure compliance with anti-corruption and antitrust regulations. Infringements will not be tolerated and will result in sanctions against the persons concerned. All Executive board members and managing directors, all senior executives and other employees must be aware of the extraordinary risks which corruption and antitrust violations can signify for the Group as well as for them personally. All employees are requested to contribute actively in their areas of responsibility.





2. Conduct in business

Avoiding conflicts of interest

At Arvedi Group business decisions are made exclusively in the best interests of the Company. Any conflicts of interest with personal matters or other business or non-business activities, including those of relatives or other related parties should be avoided. Should such conflicts nevertheless occur, they must be dealt with openly and transparently.



Preventing money-laundering and terrorist financing

The Group fulfills its legal obligations pertaining to the prevention of moneylaundering and terrorist financing, and to refrain from becoming directly or indirectly involved in any money-laundering activities or terrorist financing.

In cases of doubt, all employees are required to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the responsible finance, legal or compliance department for review.

Foreign Trade

The Group strictly comply with the relevant international and national foreign trade regulations, including in particular regulations concerning export controls and embargoes, monitoring business transactions to refrain from being involved in any illegal business dealings with persons, companies or organizations that are subject to sanctions.

Conflict Minerals and High-Risk Raw Materials

The Group duly exercise the duty of care to promote responsible raw material supply chains and to comply with all applicable statutory rules pertaining to conflict materials., particularly including tin, tantalum, tungsten, gold and their ores and metals, to be procured from conflict-free sources. In cases where a product contains one or several conflict minerals or high-risk raw materials, e.g. cobalt, the Group assures transparency of their supply chain all the way to the smelter and origin of the material.





CONDUCT WITHIN THE SOCIETY





3. Conduct within the Society



Sustainability and protection of environment and climate

The Group conforms with the relevant

energy and environmental laws, regulations and standards, installs and applies an adequate environmental and energy management system. Resources, e.g. energy, water and raw materials, are consumed efficiently and responsibly while utilizing technologies aimed at preventing and reducing waste, CO2, wastewater contaminations, and emissions of hazardous substances.

The Group takes all appropriate measures for the disposal and management of toxic or dangerous products and also adopts all processes, controls and protocols or production standards that enable products, packaging, wrappings and packs to be as eco-friendly as possible.

The Group promotes transparency with respect to own emissions as well as upstream activities, implementing effective measures aimed at reducing direct and indirect CO2 emissions in accordance with the Paris Climate Agreement, working on continuous improvements, aimed to further advance the use of renewable and alternative energy sources.

Quality standards and products risk management

The Group always meet the technical and statutory requirements pertaining to the quality of products and processes. Any detected defects or shortcomings is corrected promptly and the cause is investigated and eliminated permanently. As a general rule, processes are continuously scrutinized and improved with the objective of increasing their performance in terms of function, costs and timeliness.





3. Conduct within the Society

Donations and sponsorships

Companies are active corporate citizen and demonstrate their commitment in a variety of ways, such as donations, sposnsorships.

We make no financial contributions with the purpose of facilitating business relations and to political parties, organizations related or similar to parties, individual office incumbents or candidates for political offices.



Political lobbying

The Group comply with the legal requirements and European Union Code of Conduct on lobbying and avoid at all costs unfairly influencing government policy and legislation.

Behavior in public and communications

The Group respects the right to free speech and the protection of personal rights and privacy. All employees should be aware that in their private lives they can also be seen as part and representative of Arvedi Group and are therefore called upon to safeguard the Company's standing and reputation in the way they act and conduct themselves in public, above all towards the media.





4 DATA PROTECTION AND INFORMATION SECURITY







4. Data protection and Information Security

The protection of personal data in particular of employees, customers and suppliers, is of particular importance to Arvedi Group, observing all relevant data protection laws. Personal data may be collected or processed only where permitted by law or with the consent of the

person concerned. The Companies' IT systems are adequately managed by implemented technical measures to protect them against unauthorized access.







5 PROTECTION OF COMPANY PROPERTY





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5. Protection of company property

Companies he Company's tangible and intangible assets exclusively for business purposes. protecting them against loss, theft or misuse. Intellectual property represents a competitive advantage for the Arvedi Group, and therefore and is therefore a valuable asset which we protect against all unauthorized access by third parties.







6 CODE OF CONDUCT IMPLEMENTATION AND REPORTING



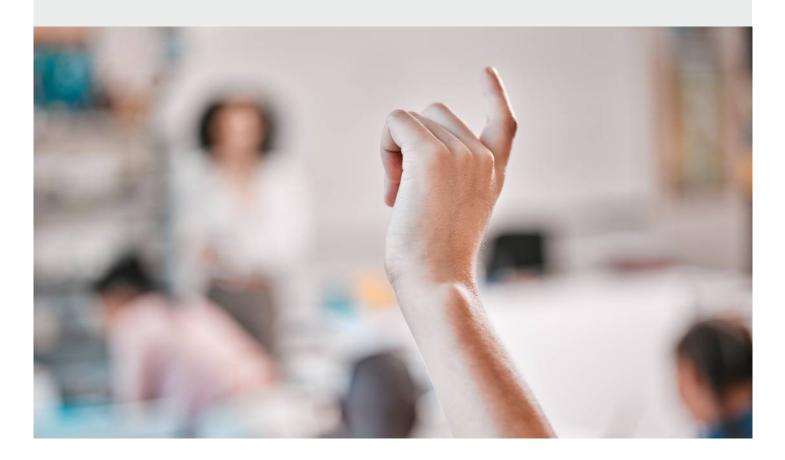


6. Code of Conduct Implementation and Reporting

Our managers have particular responsibility to ensure that their actions measure up to the Code of Conduct. As part of their management duties, they shall prevent unacceptable conduct and take suitable measures to avoid infringements of rules in their area of responsibility.

If there are concrete indications of a potential violation that could potentially affect the Companies, a report is due using our Group whistleblower system available y all employees, suppliers, customers and other third parties under the following link: Whistleblowing - Login page (unionefiduciaria.it)

The Group protects the interests of whistleblowers by providing them secure reporting systems, as well as by the commitment to treat the information received confidentially. The Group will also protect the interests of the data subject about whom information is provided by a whistleblower.







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