



CODE OF ETHICS

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1. INTRODUCTION

Since 1967 Meliconi SPA has always aimed to find smart responses to everyday problems, by continually searching for solutions and creating innovative products.

The scenarios we face on a daily basis and the rapidly evolving contexts in which the Company finds itself meant that Meliconi SPA needed to clearly define its values, which it now wants to share in a document essential to the company's positive growth.

The Code of Ethics is therefore the document chosen to contain corporate rules and ethics drawn up by the Company and to which all of its members must adhere and aspire; it defines the social ethical responsibilities of each part of the corporate organisation of Meliconi SPA, referred to below as Meliconi.

This document is intended as a guide to responsible conduct by those operating in the name and on behalf of the Company, introducing a clear, explicit definition of each company operator, relating to those directly or indirectly involved in Meliconi business, that is to say, customers, suppliers, shareholders, employees, collaborators, public institutions and anyone else affected by the Company's activities.

The good level of quality strived for in carrying out its business is recognised with UNI EN ISO 9001:2015 certification of the Company Quality Management System, as well as by the Competition and Market Authority through the legality rating.

Those for whom the code is intended are called upon to strictly and fully comply with the principles and values set out in it and to protect and preserve, through their conduct, Meliconi's respectability and image as well as the integrity of its human, social and economic resources.

However, the Code of Ethics does not replace and does not take precedence over the laws in force and the existing National Collective Bargaining Agreement, which retain their express and fundamental effectiveness and value.

Through the Code of Ethics Meliconi aims in particular to:

- make clear and define the general ethical principles and values instilled in its activities, in the relationships with employees, customers, suppliers, shareholders, collaborators, directors, public institutions and any other subject involved in company activities;
- formalise the commitment to behave in accordance with the ethical principles of moral legality of equity and equality, diligence, transparency, protection of individual rights, honesty, protection of health, confidentiality, impartiality;
- express to its employees, collaborators and directors the principles of conduct, the values and responsibilities which they must precisely comply with when carrying out their work;
- describe and define tools for implementation and the method to be applied in line with the Code of Ethics.

2. GENERAL CRITERIA

2.1 WHO THE CODE OF ETHICS IS FOR

In any situations and context, all of those for whom this Code of Ethics is intended are required to comply with the content and underlying principles when exercising their powers and carrying out their specific duties.

The company's Board of Directors proposes and implements projects, actions and investments useful for its long-term economic growth and the well-being of its employees, customers and suppliers; area managers shall be responsible within and outside the company, for strengthening trust, unity and a team spirit; company employees must commit to compliance with the rules and laws in force and, where any doubts arise about how to proceed, they must ask their superiors to provide the necessary instructions and guidance.

Meliconi expects each person for whom this Code of Ethics is intended to familiarise themselves with the content and to actively contribute to implementation of the code and to report any non-compliance and breaches.

In particular, the Meliconi Board of Directors undertakes to oversee the effective implementation of the Code of Ethics by each person for whom it is intended.

2.2 CIRCULATING THE CODE OF ETHICS AND AWARENESS OF IT

Meliconi undertakes to promote and ensure suitable awareness of the Code of Ethics by circulating it amongst those for whom it is intended and requesting that they adapt their conduct towards Meliconi to that carefully described in the Code, preparing suitable information, prevention and control tools to guarantee transparency of operations and conduct established, if necessary intervening with corrective action.

Employees and collaborators must promptly report - to the Board of Directors, specifically the director tasked with monitoring compliance with and implementation of the Code of Ethics, identified in the minutes approving the Code of Ethics, any information they learn concerning breaches of the principles of the Code of Ethics, so that the Board of Directors can promptly produce all necessary protective initiatives and all interventions in any case useful to bring conduct back within the Ethical standards.

2.3 BASIC PRINCIPLES

In line with its ethical vision, in its business activities Meliconi complies with the fundamental rights of all individuals, ensuring equal opportunities and protecting their moral integrity.

Meliconi expressly forbids any kind of discrimination relating to diversity of language, race, colour, faith and religion, politics, nationality, ethnicity, age, gender and sexual orientation, disability and physical appearance, as well as socio-economic status. Therefore, it does not tolerate the granting of any privilege linked to the above, except what is envisaged by the regulations in force. Meliconi rejects any form of forced labour, or child labour and does not tolerate breaches of human rights.

Meliconi wishes to preserve a calm working environment, in which everyone can work in compliance with the law, shared values and principles. In particular, it does not tolerate any form of isolation, exploitation or molestation due to any form of discrimination, for work or personal reasons.

2.4 VALUE OF HUMAN RESOURCES

Meliconi believes in the value of human resources as a means for improving and growing assets and competitiveness in terms of each person's skills, since employees, collaborators and business operators are indispensable to company success.

The professional potential and the skills of individuals are central elements to Meliconi personnel development; therefore, the company believes that full cooperation in a commitment to improvement is an essential factor for development and progress, both personal and professional.

Professional management, training selection and in general development, are therefore carried out without discrimination, based on merit, ability and professionalism.

Meliconi considers training and learning to be a permanent reference point, by means of which it is possible to acquire knowledge, understand and effectively interpret change, improve productivity, have new ideas and achieve growth at individual and overall company level.

Meliconi puts research and innovation at the heart of its activities, considering the latter to need great dynamism at organisational level, as well as a focus on the people who are part of the company, on customers and on suppliers. At Meliconi innovation doesn't just relate to what is strictly technological, but also to human relationships. For that reason, it combines technological values with ethical ones, internally promoting a climate of widespread trust which results in greater operating efficiency, based on the synergy between people and company, on a sense of responsibility and respecting the extremely close link between economic imperatives and ethical values.

3. PRINCIPLES OF CONDUCT

3.1 COMPANY RESPONSIBILITIES

The Meliconi Board of Directors and managers, aware of their duties, pursue the principles in this Code of Ethics and undertake to guide their activities with honesty, integrity in the pursuit of company goals, fairness, honesty, respect for people and rules, mutual cooperation. In particular, the Board of Directors is committed to governing the company responsibly as it pursues goals of creating value.

More specifically Meliconi undertakes:

- to provide every possible clarification regarding interpretation and implementation of the rules of the Code of Ethics and in particular concerning its application of company procedures;
- to ensure the maximum spread of the Code of Ethics amongst employees and external collaborators;
- to carry out checks on every report of a breach of the Code of Ethics and, if it is established that a breach has occurred, adopt suitable corrective action which may include sanctions;
- to take all action necessary to guarantee the physical and moral integrity of workers.

Meliconi guarantees the safety of its workplaces for its personnel and for third parties involved, undertaking to comply with the regulations in force.

Meliconi undertakes to spread and consolidate a strong environmental culture and awareness, always operating in compliance with the laws in force and applying the best technologies available.

The principle to which Meliconi aspires is the result of the desire to create, offer and preserve a healthy environment within the company, and even to extend it to the wider concept of preserving the environment for future generations.

3.2 SPECIFIC COMMITMENTS OF COMPANY DEPARTMENT MANAGERS

The conduct of each company area or department manager must comply with the values of this Code of Ethics and be an example for their collaborators.

They establish with their collaborators relationships based on mutual respect and profitable cooperation, nurturing a spirit of belonging at Meliconi.

Motivating employees and spreading company values, so that they can be internalized and shared, are essential: in that respect managers are committed to implementing and preserving flows of correct, valid and motivating information, capable of making the employee aware of the contribution to company business from each of the resources involved.

Each company area or department manager supports the professional development of assigned resources, taking into consideration the aptitude of each when assigning duties, so as to achieve real operating efficiency.

All are guaranteed the same identical opportunities to express their professional potential.

Each company area or department manager pays attention to and, where appropriate, follows up on suggestions or requests submitted by their collaborators, with a total quality perspective, favouring reasoned participation in company activities.

More specifically, each company area or department manager is obliged to:

- provide with their own conduct an example for employees in their own company area or department and to direct those employees to comply with this Code of Ethics;
- operate in such a way that they understand that compliance with this Code of Ethics is an essential part of their work quality;

- report to the Board of Directors, specifically the Director identified in sec. 2.2 of this Code of Ethics, information supplied by employees or their own observations about possible cases, even suspicions, of breaches of the rules of the Code of Ethics.

3.3 EMPLOYEE COMMITMENTS

In complying with legal and contractual provisions concerning workers' duties, employees are asked to demonstrate professionalism, honesty, dedication, fairness, a spirit of mutual respect and cooperation.

The dynamics of the sphere in which the company operates require transparency of conduct. The main factor behind its success is the professional and organisational contribution guaranteed by each of the human resources involved.

Meliconi employees shall:

- promptly report to their area or department manager, who will in turn report to the Board of Directors, specifically the Director identified above, any information about possible breaches;
- avoid conduct which is contrary to the rules dictated by the Code of Ethics;
- always conduct themselves in a way which ensures maximum transparency, honesty and legitimacy, doing their job with professional commitment and exactness, providing a suitable contribution to the responsibilities assigned and operating in a way which protects the prestige and good name of the company.

Relationships between employees, at all levels, must be based on criteria and conduct characterised by honesty, cooperation, mutual respect and social harmony.

Every employee of the company has the right to be trained and informed about the routine procedures and rules relating to their duties, so that they are aware of potential risks and know when to request company support, and can then apply that knowledge under their own responsibility.

Each employee must work, whatever the level of responsibility linked to the role, with the highest possible degree of efficiency, complying with the operating instructions issued by higher hierarchical levels and together with colleagues and superiors must pursue shared goals. An employee who believes that their direct manager wants to make them behave in ways or perform actions which are unethical must immediately warn the Board of Directors, specifically the Director identified in sec. 2.2 of this Code of Ethics.

Meliconi employees and external collaborators must show a constant commitment to making the most of their skills acquired, aware that they are continuously improving them with the tools offered by the company and personal commitment. They must be driven by a natural collaborative incentive and are continuously guided to make improvements, both in individual performance and team work, with a special focus on the importance both of time management, and of decision making and choice. In that way, Meliconi pursues excellence starting with the individual all the way up to the company level.

According to their particular competence, company personnel must appropriately notify third parties about the content of the Code of Ethics, and demand compliance with it.

3.4 USE OF COMPANY EQUIPMENT AND TOOLS

The employee must ensure maximum respect for company materials, infrastructures, equipment and tools, promptly warning their manager if they suspect anyone is making non-compliant use of these. These include, for example, furniture and furnishings, premises, operating kit and equipment (such as company cars, tools, personal computers, printers, photocopiers, servers, or even communication tools, such as telephone, fax, e-mail, personal office supplies, paper), functionalities offered by the company information system (such as processing procedures, software, Internet access, database and the like), books, manuals and journals.

The employee must use what is made available by the company only for carrying out the work duties assigned to them. Therefore, employees are forbidden from acting with company equipment, whether IT, technical or

any other type of equipment, for private purposes or interests excluding equipment which is counted as an employee fringe benefit.

In general the employee is allowed to use company kit and/or material outside of company structures only if using them for company purposes, such as, for example transfers to offices other than the usual one, work on secondment and the like. In all other cases express authorisation from a superior must be obtained.

3.5 CONFLICT OF INTEREST

Employees must abstain from all activities and/or situations in which a conflict with company interests may arise or which may interfere with their ability to impartially make decisions in the company's interests and in full compliance with the rules of this Code of Ethics. Employees must avoid conflicts of interest between personal and family business activities and the duties covered within the company structure belonged to.

To prevent conflicts of interest from arising, each operation and work activity must only and exclusively be undertaken in the company's interests and in an honest, transparent and fair way.

Any situation which might form or cause a conflict of interest must be promptly reported to the Board of Directors, specifically the Director indicated in sec. 2.2 of this Code of Ethics.

By way of example only, the following lead to a conflict of interest:

- carrying out work activities, of any type, at customer, supplier or competitor premises;
- economic and financial interests of the employee and/or their family used in competition with or against those of the company;
- accepting cash, favours or benefits from people or companies who are or intend to enter into business with the company.

Given the variety of circumstances which may arise, if in doubt as to whether or not a conflict of interest exists, employees can consult, – depending on the cases, their own area or department manager, or the Board of Directors, specifically the Director identified in sec. 2.2 of this Code of Ethics for the necessary clarification.

3.6 CONFIDENTIALITY AND PERSONAL DATA PROCESSING

The employee must maintain the strictest absolute confidentiality concerning all information about the company and/or its employees which they become aware of as a result of their work activities. This prevents the spread of confidential information about the organisation, the production methods and any other information which if revealed might damage the company. In particular, personnel must:

- accept and process only the data necessary and appropriate for the purposes directly traceable to the tasks carried out;
- acquire and process the data as defined by applicable rules and regulations, about which they have been trained and informed - store the data in such a way as to prevent other, unauthorised persons from accessing it;
- disclose the data as part of predefined procedures and/or if explicitly authorised by superiors;
- ensure that there are no constraints on possible divulging of the data regarding third parties linked to the company by any type of relationship and, where applicable, obtain their consent.

Meliconi collects and processes the personal data of customers, collaborators, employees and other subjects, both individuals and corporations for purposes strictly linked to the activity carried out. That data consists of any information which can be used directly or indirectly to identify a person, and may include special category data, such as those revealing racial or ethnic origin, and/or health. Meliconi undertakes to process such data within the limits of and in compliance with what is envisaged by privacy regulations in force, specifically with reference to Legislative Decree 196/2003 ("Privacy Code") as far as is still applicable and

related annexes, plus the rules of the Personal data protection Supervising Authority and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

Meliconi personnel who, in performing their work duties, process both special category data and non-special category data, must always proceed in compliance with the above-mentioned regulation and the operating instructions already issued.

3.7 CONDUCT IN PROFESSIONAL ACTIVITIES AND WAY OF OPERATING

In all business relationships, the company aspires to principles of honesty, transparency, fairness, efficiency and competition in the market.

Company employees, collaborators, even external ones, whose actions may, even indirectly, reflect on Meliconi, must behave with honesty in business and in relationships with customers, irrespective of the importance of the business conducted.

They must not offer cash or gifts to executives, officers or employees of customers or their relatives, except for gifts or favours of low value. In any case the type of expense must be specifically authorised and carefully documented, identified in accounting and properly dealt with for tax purposes or for other internal audit purposes.

Any employee who is offered or who receives gifts from third parties, which are not attributable to normal business courtesies, must immediately inform their superior. In the case of Christmas or other types of gifts for individual workers, such gifts must be brought to the attention of the company management which will provide its assessment of whether or not they can be accepted. Even non-employee external collaborators (consultants, agents, service providers) must adhere to the principles of this Code of Ethics.

Main aims must include continuous personal training, acting to gradually increase knowledge within the working environment and, as far as possible, promoting the sharing of knowledge already acquired.

If anyone finds themselves in difficulty when carrying out their work, they must promptly report this to their manager, so that arrangements can be made to have someone work alongside them or, if necessary, replace them.

3.8 COMPLIANCE WITH FREE MARKET COMPETITION REGULATIONS

All employees must behave in such a way as to achieve the best results in competition, in full compliance with regulations governing free market competition.

Any exchange of information and/or agreements, with any competitor relating to prices, pricing policies, discounts, promotions, terms of sale, production costs are prohibited: the company does not want to in any way restrict or distort competition.

Any form of agreement, whether direct or indirect, reached with competitors in order to affect the result of bidding for public supply contracts is prohibited.

Any employee or collaborator operating in the business must bring before the management any doubts about initiatives which might be included in those sanctioned by law, so as to ensure that they operate in full compliance with the rules.

3.9 RELATIONSHIPS WITH SUPPLIERS

In relationships for the supply of goods and/or services, therefore supplies, employees must:

- follow the internal procedures for selection and management of relationships with suppliers;
- ensure the cooperation of suppliers to guarantee that quality, cost and delivery time requirements are met;
- comply with and ensure that others comply with the contractual conditions, preserving an honest and open dialogue with suppliers, in line with business best practice;

- report to their superior any problems which arise with a supplier, allowing assessment of the consequences.

3.10 RELATIONSHIPS WITH CUSTOMERS

The customer is at the heart of company business: the company owes its prosperity to the customer. The customer is defined as anyone who uses company services and work, irrespective of legal form.

The solution supplied to the customer must always be tested in advance. It must have the reliability and safety features established at the design stage, otherwise it must be replaced at the company's expense. Company employees must:

- provide precise, full information about the products and services offered in such a way that the customer can make informed decisions;
- be truthful in advertising or other messaging;
- not talk negatively about competitors, but instead praise Meliconi's qualities and its products.

3.11 RELATIONSHIPS WITH PUBLIC INSTITUTIONS

In relationships with the public administration, employees whose duties within the company include applying for, handling and/or managing contributions, funding or loans from the government or from other public bodies shall, within the limits of their functions, ensure that the afore-said relationships are intended for the purposes for which they were requested and in any case keep precise documentation of every transaction, ensuring maximum transparency and clarity in the relative movements of money. Meliconi acts in full cooperation with regulatory and government bodies within the framework of their legitimate activities. Should the company be the subject of legitimate inspections conducted by public authorities, it will cooperate fully.

3.12 RELATIONSHIPS WITH THE MEDIA

Employees, collaborators, even external, and the company itself must ensure that Meliconi's image appears in keeping with the prestige and importance of the company's role in the panorama of producers in the territory.

Relationships with the media are reserved exclusively for those members of staff assigned those duties

Employees cannot supply information or opinions and issue statements claiming to represent the company to the media (such as the press, television, radio, etc.), nor can they take it upon themselves to issue them without the necessary authorisation from the relevant managers.

Under no circumstances shall employees offer payments, gifts or other benefits with the intention of influencing the work of media departments.

3.13 ACCOUNTING TRANSPARENCY

Every transaction and/or operation must be correctly recorded, authorised, verifiable, lawful, consistent and appropriate. All actions and operations must be accompanied by appropriate records and it must be possible to check the decision-making process, authorisation and execution.

Accounting transparency is based on precision, completeness and authorisation of the basic information for the relative accounting records. Each employee must cooperate to ensure that operations are correctly and promptly represented in the accounts.

For each operation appropriate supporting documentation must be kept for the work done, to allow easy recording in the accounts, identification of the various levels of responsibility and precise reconstruction of the operation, even to reduce the chance of errors in interpretation.

Each record must precisely reflect what is shown in the supporting documentation.

All of the documentation must be promptly and methodically archived in such a way that at any time it is possible to reconstruct the relative accounting picture: in addition to archiving in the relevant hard copy binders, if necessary, the documents must also be stored on electronic media from which they can quickly be traced and displayed using special document management software.

Every employee must ensure that documentation relating to their activities is easily traceable and arranged in an orderly fashion according to logical criteria. In any case company payments to be made must be exclusively proportionate to the service and method indicated in the contract and cannot be made to a subject other than the party named in the contract.

Under no circumstances shall anyone be issued any payments which are not based on suitably authorised company transactions or shall illegal forms of remuneration be dispensed.

Any negligence, omission or falsification which employees become aware of must be promptly reported to management.

3.14 MARKETING ACTIVITIES

In marketing campaigns, Meliconi undertakes to supply only factual information.

It also undertakes to comply with privacy law as regards addresses and other information relating to campaign reference targets, allowing anyone to request details of how their name was obtained and offering the possibility of deletion from the lists. In this communication tool too, companies operating in the name and on behalf of Meliconi agree to:

- manage, in compliance with the privacy regulations in force, the names and data in their mailing lists and not send untrue or defamatory information by e-mail;
- not engage in spamming of current and potential customers, to allow the possibility of deletion from mailing lists at any time and to supply at any time information about how a user's data were obtained;
- equip themselves with all technological tools necessary so that, in sending messages by e-mail no files are attached which could contain computer viruses that could damage the contents of the recipients' computers or their e-mail systems.

4. SPECIAL RULES: IMPLEMENTATION AND GUARANTEES

4.1 BREACH OF THE CODE OF ETHICS - DISCIPLINARY MEASURES

Meliconi has up to now had an outstanding long tradition of compliance with the regulations in force for each specific area of interest, which has given it credibility and has been appreciated by customers. Unethical conduct could damage the company's trust-based relationship, causing extremely serious damage to its image, reputation and credibility.

Employees and external collaborators must comply with all aspects of this Code of Ethics.

Compliance with the rules of this Code of Ethics is therefore an essential part of the contractual obligations of Meliconi workers (employees and collaborators), in accordance with articles 2104 (Diligence of the worker), 2105 (Duty of loyalty) and 2106 (Disciplinary sanctions) of the Civil Code.

Breach of the provisions of this Code of Ethics by workers (employees and collaborators) is non-fulfilment of contractual obligations and may, according to the circumstances, result in application of the disciplinary sanctions and measures envisaged in the collective agreements applied, termination of the working relationship, payment of damages.

Meliconi will take appropriate measures against anyone whose conduct is reported by the Board of Directors, specifically the Director identified in sec. 2.2 of this Code of Ethics as failing to comply with the latter.

Disciplinary measures may include, at Meliconi's sole discretion, verbal or written reprimand, suspension or immediate termination of the working relationship, or any other disciplinary measure deemed appropriate for the circumstances.

4.2. REPORTING OF VIOLATIONS OF NATIONAL AND UNION REGULATIONS – WHISTLEBLOWING PROCEDURE

Meliconi Spa, in compliance with the provisions of Legislative Decree No. 24/2023 (which introduces the new whistleblowing regulations in Italy), has established specific confidential channels that can be used to report violations of national or European Union regulations that may occur within the company (see the "Instructions for Reporting Regulatory Violations in the Company (so-called Whistleblowing) pursuant to the provisions of Legislative Decree No. 24/2023").

4.3 FINAL PRINCIPLES

This Code of Ethics aims to remind everyone and always of the company spirit and the reason why it was set up.

The rules set out in this Code of Ethics are not an exhaustive list of the rules and regulations adopted by Meliconi, nor a complete list of types of conduct susceptible to disciplinary measures, up to and including dismissal.

This Code of Ethics was approved on **19/05/2023** by the Board of Directors of Meliconi and subsequently integrated with paragraph 4.2 concerning the whistleblowing procedure. Therefore, from the date of approval and subsequent integration, it is made effective and mandatory for all internal and external company collaborators.