



# **CODE OF ETHICS OF DULEVO INTERNATIONAL S.P.A.**

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## INTRODUCTION

Dulevo International S.p.A (hereinafter also referred to as "Dulevo") operates in the production and sale of sweepers and scrubber dryers, vacuum systems and single-disc machines. Since the start of its business operations, Dulevo has been exporting, all around the world, the sweeper and scrubber dryer technologies available on the market.

Offering customers maximum value through the continuous development of ideas and projects has enabled the achievement of significant goals, both in the commercial and technological fields. Intensive research and development activities have helped build the solid foundations of sales and distribution that a competent and professional company like Dulevo can now make available to its customers.

The company's business model, focused on addressing new market challenges, has promoted continuous development of technical expertise and ongoing human resource specialization, primarily to ensure professional service and consistent quality.

Due to its size and the extent of its activities, Dulevo plays a significant role in the economic conditions, development and well-being of the communities in which it operates.

Dulevo operates in a variety of institutional, economic, political, social, and cultural contexts that are constantly and rapidly evolving. All of Dulevo's activities must be carried out in compliance with the law and in a context of fair competition, honesty, integrity and good faith, respecting the legitimate interests of customers, employees, shareholders, business and financial partners, and the communities in which Dulevo carries out its business activities. Everybody who works here, without distinction or exception, is committed to observing and ensuring the observance of these principles within the scope of their roles and responsibilities. In no circumstances can the belief to be acting in the company's interest justify behaviours that are contrary to these principles.

Due to the complexity of the situations in which Dulevo operates, it is important to clearly define the set of values that the company recognizes, accepts and shares, as well as all the internal and external responsibilities it assumes. For this reason, a Code of Ethics ("Code") has been adopted, compliance with which by employees, the Board of Directors and the Board of Statutory Auditors, as well as by external collaborators who contribute to the achievement of Dulevo's objectives ("Recipients"), is of fundamental importance for the company's proper functioning, reliability, and reputation, all factors that are crucial assets for the success of the company.

In addition to the obligation of fulfilling in good faith the general duties of loyalty, fairness and performance of the employment contract, Dulevo employees must refrain from engaging in activities in competition with those of Dulevo, comply with company rules and abide by the precepts of the Code, as also required pursuant to Article 2104 of the Italian Civil Code.

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<sup>1</sup> "Art. 2104: Diligence of the employee. - The employee shall use the diligence required by the nature of the service provided, the interest of the company and the higher interest of national production.

All Recipients are required to know the Code, to actively contribute to its implementation and to report any shortcomings. Dulevo undertakes to facilitate and promote the Recipients' knowledge of the Code and their constructive contribution to its contents.

Any behaviour contrary to the letter and spirit of the Code will be sanctioned in accordance with the provisions of the Code itself.

Dulevo will carefully monitor compliance with the Code, providing the appropriate information, prevention and control tools, ensuring transparency in operations and behaviours and, if necessary, taking corrective action.

The Code is brought to the attention of all those with whom Dulevo has business relationships.

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Furthermore, he or she must also comply with the instructions for the execution and regulation of the work issued by the entrepreneur and the latter's associates to whom he or she hierarchically reports to. "

## **1. GENERAL PRINCIPLES**

### **1.1. RECIPIENTS AND SCOPE OF APPLICATION OF THE CODE**

Moral integrity is a constant duty for all those who work for Dulevo and it characterizes the conduct of the entire organisation.

The rules of the Code apply without exception to the employees, the Board of Directors and the members of the Board of Statutory Auditors at Dulevo, as well as to all those who work to achieve Dulevo's goals.

Dulevo's management is required to observe the rules of the Code when proposing and implementing projects, operations and investments aimed at increasing over time the company's value in terms of assets, management and technology, shareholder returns, and the long-term well-being of employees and the community.

In setting corporate objectives, the Board of Director is guided by the principles of the Code.

It is primarily the responsibility of the managers to put into practice the values and principles contained in the Code, by assuming responsibility both internally and externally and by strengthening the trust, cohesion, and spirit of the company.

The Recipients, already in due compliance with current law and regulations, will adapt their actions and behaviour to conform with the principles, objectives, and commitments set out in the Code.

All actions, operations and transactions and, generally, behaviour undertaken by Recipients in the course of their work activities are guided by the utmost correctness from a management perspective, by completeness and transparency of information, by formal and substantive compliance with legality, and by clarity and truth in accounting records in accordance with current laws and internal procedures.

Dulevo, through its employees, cooperates actively and fully cooperates with the Authorities. All company activities must be carried out with commitment and professional rigour.

All employees must make a professional contribution commensurate with their assigned roles and act in a manner that protects the reputation of Dulevo.

Relationships among employees at all levels must be guided by fair, collaborative, loyal and mutually respectful principles and behaviours. For advice about full compliance with the Code, all employees may contact directly, in addition to their own managers, the internal staff specifically assigned to this role.

## **1.2. DULEVO COMMITMENTS**

Dulevo, with the support of the Supervisory Body, is committed to ensuring:

- the dissemination of the Code to the Recipients;
- in-depth study and updating of the Code in order to adapt it to the evolution of social attitudes and of regulations relevant to the Code;
- the provision of adequate knowledge and information tools regarding the interpretation and implementation of the rules set out in the Code;
- that each report of violations of the Code or related rules is thoroughly checked;
- the assessment of the facts and the consequent implementation of appropriate punitive measures in the event of confirmed violations;
- that no one may suffer retaliation of any kind for reporting violations of the Code or related regulations.

## **1.3. OBLIGATIONS FOR ALL EMPLOYEES**

All employees are required to be familiar with the rules of the Code and with the related regulations that govern the activities carried out in the performance of their roles.

Dulevo employees have the obligation to:

- refrain from behaviour contrary to these rules;
- contact their managers if they need clarification on how to apply them;
- promptly report to their managers any information, whether directly observed or reported by others, concerning possible violations or any request to violate them;
- collaborate in the investigation of possible violations.

If, after reporting a possible violation, the employee believes that the matter has not been adequately addressed or they have faced retaliation, they can contact the Supervisory Body.

The employee may not conduct personal investigations or report information to anybody other than their managers or the Supervisory Body.

## **1.4. ADDITIONAL OBLIGATIONS FOR HEADS OF COMPANY DIVISIONS AND DEPARTMENTS**

Every Division/Department Manager has the obligation to:

- set an example to their employees through their own behaviour;
- direct employees to comply with the Code and encourage them to raise issues and questions regarding the rules;
- take steps to ensure that employees understand that compliance with the rules of the Code is an essential part of the quality of job performance;
- within the scope of their responsibilities, carefully select employees and external collaborators so as to assigning tasks to individuals who seem not to be fully committed to comply with the rules of the Code;
- promptly report to their own superior any information about possible violations of the rules witnessed by them or reported by employees;
- take immediate corrective measures when required by the situation;
- prevent any form of retaliation.

#### **1.5. APPLICATION OF THE CODE TO THIRD PARTIES**

In dealing with third parties, all Dulevo employees, according to their area of expertise, will take care to:

- keep them adequately informed about the commitments and obligations required by the Code;
- require compliance with obligations directly related to their activities;
- take appropriate internal and, if within their competence, external measures in case of failure of third parties to comply with the rules of the Code.

#### **1.6. CONTRACTUAL VALUE OF THE CODE**

Compliance with the rules of the Code is to be considered an essential part of the contractual obligations of Dulevo employees, pursuant to and for the purposes of Art. 2104 of the Italian Civil Code.

Violation of the rules of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences, including with regard to the preservation of the employment relationship, and may lead to compensation for damages arising therefrom.



## 2. RELATIONSHIPS WITH THIRD PARTIES

### 2.1. GENERAL PRINCIPLES

To achieve its objectives, Dulevo is guided by the following principles (hereinafter referred to as the "Principles") in its relationships with third parties:

- honesty;
- integrity;
- transparency;
- equality and impartiality;
- loyalty, fairness and good faith;
- compliance with all legal and regulatory provisions in force in the countries in which Dulevo operates;
- strictest compliance with rules of conduct when dealing with the Public Administration, in full respect of institutional functions;
- clarity;
- respect for individuals;
- environmental protection and safety, including workplace safety.

Dulevo employees and external collaborators, whose actions may be in any way associated with the Company, must act correctly when conducting business in the interest of the Company and in dealings with the Public Administration, regardless of market competitiveness and the importance of the business in question.

Practices of corruption, fraud, swindling, illegal favours, collusive behaviour, solicitations - direct and/or through third parties - to obtain personal or career advantages for oneself or others, are prohibited.

Dulevo acknowledges and respects the right of the Recipients to participate in investments, business, and other activities outside those conducted in the interest of the Company, provided they are legal activities and compatible with the obligations arising from their relationship with the Company.

In the context of the relationships established with Dulevo, without prejudice to applicable legislation, the Recipients refrain from engaging in activities contrary to the Company's interests or that may interfere with their ability to make impartial decisions in the best interests of the Company and in full compliance with the principles of the Code of Ethics.

In no case, however, can the pursuit of Dulevo's interests justify conduct contrary to the Principles.

Any situation that may constitute or result in a conflict of interest must be promptly reported to the relevant manager or department. In particular, all Recipients of the rules of this Code of Ethics are required to avoid conflicts of interest between personal and family economic activities and the duties/tasks they carry out in the organisation to which they belong.

It is not permitted to directly or indirectly offer or provide payments and material benefits of any kind to third parties, whether public officials or private individuals, in order to influence or remunerate the actions of their office. Acts of business courtesy, such as gifts or forms of hospitality, are allowed insofar as they are modest in value and never such as to compromise the integrity or reputation of either party and not liable to be interpreted, by an impartial observer, as meant to gain advantages in an improper way. In any case, this type of expenditure must always be authorized by persons with the power to do so according to the existing delegation and proxy system.

## **2.2. RELATIONSHIPS WITH CUSTOMERS**

Dulevo's behaviour towards its customers is marked by availability, respect, courtesy and the maintenance of high standards of professionalism. Illegal, collusive practices, illicit payments, corruption attempts and favouritism are prohibited.

Contracts with the Company's customers and all communications with them must be clear, simple, complete and transparent, as well as compliant with current regulations.

Regarding its relationships with customers and in compliance with internal procedures, Dulevo is committed to ensuring customer satisfaction by fulfilling the commitments it has made.

In particular, it undertakes the obligation to:

- comply with internal procedures for managing relationships with customers;
- provide, with efficiency and courtesy, within the limits of contractual provisions, quality services;
- provide accurate and comprehensive information about services so that the customer can make informed decisions.

## **2.3. RELATIONSHIPS WITH SUPPLIERS**

In relationships regarding tenders and procurement and, in general, the supply of goods and/or services, Recipients have the obligation to:

- comply with internal procedures for the selection and management of relationships with suppliers;
- not deny any qualified supplier, in possession of the necessary requirements, the possibility of competing to offers its products and services to Dulevo, adopting objective evaluation criteria in the selection process based on open and transparent methods;

- obtain the collaboration of suppliers in constantly ensuring that the needs of Dulevo's customers are met in terms of quality, cost, and delivery times, to an extent at least equal to their expectations;
- to the greatest extent possible, in compliance with current laws, use products and services under competitive conditions;
- observe the conditions set out in the Contract;
- maintain frank and open communications with the suppliers, in line with good business practices.

Dulevo pursues its business success on the markets by offering quality products and services at competitive conditions and in compliance with all regulations aimed at protecting fair competition.

#### **2.4. RELATIONSHIPS WITH PUBLIC INSTITUTIONS AND PRIVATE ENTITIES**

Dulevo's relationships with the Public Administration, public officials and persons in charge of public service, ASL (Local Health Authorities), INAIL (National Institute for Insurance against Accidents at Work), INPS (National Institute for Social Security), hospitals and public bodies are guided by strict compliance with applicable laws and regulations and must in no way compromise the integrity and reputation of the Company.

These relationships, aimed at safeguarding Dulevo's overall interests and related to the implementation of its programs, are the exclusive duty of the relevant departments and staff.

It is not permitted to offer money, gifts or other benefits to managers, officials and employees of the Public Administration or to their relatives - whether Italian or foreign - or to other private individuals with whom business relations are maintained, unless they are gifts or benefits of modest value.

It is prohibited to offer or accept any valuable object, service, performance or favour in order to obtain more favourable treatment in any relationship with the Public Administration or with private individuals with whom the Company has business relations.

Gifts and acts of courtesy and hospitality to government representatives, public officials and public employees are allowed when they are of modest value, in compliance with local regulations, and such that they do not compromise the integrity or reputation of either party and cannot be interpreted, by an impartial observer, as an attempt to gain unfair advantages. In any case, this type of expenditure must be authorized by the subjects specified in Dulevo's internal protocol and adequately documented.

During any business negotiation, request, or dealings with the Public Administration or private bodies, the staff involved must not seek to improperly influence the decisions of the other party - including those of officials who negotiate or

make decisions on behalf of the Public Administration or the private body - or to obtain confidential information.

During business negotiations, requests, or dealings with the Public Administration or private bodies, no activities should be undertaken (directly or indirectly) with the aim of examining or proposing employment and/or commercial opportunities that may be of personal gain to employees of the Public Administration or of the private body.

Whether in public procurement or private contracts, the quality and quantity of goods specified in the call for tenders and the specifications must be guaranteed.

## **2.5. RELATIONSHIPS WITH REGULATORY BODIES**

Dulevo undertakes to adhere scrupulously to the rules set out by the Regulatory Bodies to ensure compliance with current regulations in the sectors related to its business activities (e.g., the Competition and Market Authority, the Data Protection Authority, the Ministry of Health, the Ministry of Economy and Finance, the Ministry of Transport, etc.).

The Recipients undertake to comply with any requests from the regulatory bodies in the exercise of their functions and to provide their full cooperation during investigation procedures.

## **2.6. RELATIONSHIPS WITH THE AUDITORS AND/OR THE AUDIT FIRM**

The Recipients undertake to respect the principles of transparency, professionalism, and maximum collaboration in their relationships with the auditors of the Company conducting the financial audit of Dulevo. In particular, all communications with the aforementioned parties must be characterized not only by compliance with legal provisions but also by clear and understandable language, thoroughness, promptness and informational symmetry.

## **2.7. RELATIONSHIPS WITH POLITICAL ORGANISATIONS AND TRADE UNIONS**

Dulevo does not make contributions to political parties, movements, committees, political organisations, trade unions, their representatives and candidates, except for those due under specific regulations and agreements (e.g., union dues collected on behalf of employees, contributions to trade associations, etc.).

## **2.8. GIFTS, PRESENTS AND BENEFITS**

It is not permitted to accept or offer any kind of gifts that could in any way be interpreted as exceeding normal business and courtesy practice or as conflicting with operational procedures and company directives or as intended to obtain preferential treatment in the conduct of any the activities in any way connected with the Company. Dulevo employees who receive gifts or benefits that are not included in the permitted cases are

required to report them to the Supervisory Body, which evaluates their appropriateness and communicates

Dulevo's policy to the sender. For this purpose, please refer to Dulevo's internal protocol.

## **2.9. RELATIONSHIPS WITH MASS MEDIA**

External information must be truthful and transparent.

Dulevo must present itself accurately and consistently when communicating with mass media. Relationships with mass media are the exclusive duty of the relevant departments and staff.

Information given to mass media must be accurate, coordinated and consistent with the Company's principles and policies; it must comply with laws, rules, and professional conduct practices; it must be presented in a clear and transparent way. It is absolutely prohibited to provide false, incomplete, or misleading information.

In all external communications, information concerning the Company and its activities must be truthful, clear and verifiable

The Recipients may not provide information to representatives of the mass media or undertake to provide it without the authorization of the relevant department and they must comply with the Regulations about the dissemination of confidential information.

Recipients may offer no payments, gifts or other benefits, in any manner or form whatsoever, aimed at influencing the professional activities of the mass media or which may reasonably be interpreted as such.

## **2.10. COMMUNICATION OF DULEVO'S OBJECTIVES, ACTIVITIES, RESULTS AND POINTS OF VIEW**

Recipients who need to explain or provide external information about Dulevo's objectives, activities, results, and points of view through, for example:

- participation in conferences, congresses, and seminars;
- the drafting of articles, essays, and publications in general;
- participation in public events;

are required to submit the texts, reports and intended plans of action to top management for authorization and in order to agree about their content.

## **2.11. NON-PROFIT INITIATIVES**

Dulevo promotes "non-profit" activities that demonstrate the company's commitment



to become actively and generously involved in meeting the needs of the communities in which it operates.

The Recipients, within the scope of their respective roles in the company, are required to participate in the development of individual initiatives consistent with the intervention policies and programmes and in compliance with this Code, to implement them with absolute transparency and to support them as an integral value of the Company's objectives.

### 3. TRANSPARENCY OF ACCOUNTING AND INTERNAL CONTROLS

#### 3.1. COMPANY ACCOUNTING AND FULFILMENT OF TAX OBLIGATIONS

Accounting transparency is based on truthfulness, accuracy and completeness of basic information for all accounting records. All Recipients are required to contribute to the accurate and prompt representation of management activities in the accounting records.

Adequate documentation for the activity carried out is kept for each transaction in order to ensure:

- easy recording of accounts;
- identification of the different levels of responsibility;
- accurate reconstruction of the transaction, also reducing the probability of errors of interpretation.

Each entry must reflect exactly what is contained in the supporting documentation. All employees are responsible for ensuring that the documentation is easily traceable and organised according to logical criteria.

Recipients who become aware of omissions, falsifications or acts of negligence in the accounting or in the documentation on which the accounting records are based are required to report them to their manager.

Recipients comply with tax and revenue laws; in case of doubts of interpretation, they must obtain professional opinions from specialists before carrying out a transaction or recording it in the accounts.

Active and passive invoicing must be guided by the principles of veracity and invoices that are subjectively or objectively false, even partially, are not acceptable.

Tax returns for direct or indirect taxes must be truthful.

The Recipients must not destroy, alter or hide any document which is relevant for tax and accounting purposes.

Recipients must not carry out operations aimed at the fraudulent removal of assets to guarantee previous tax credits or related contribution or insurance obligations.

#### 3.2. CORPORATE CONDUCT

Dulevo believes that its conduct should always be based on formal and substantive compliance with legal regulations, protection of the decisions made freely at shareholders' meetings,

transparent and reliable behaviour, even towards minority shareholders and creditors, preservation of the integrity of the share capital and non-distributable reserves, and cooperation with the relevant authorities.

### **3.3. INTERNAL CONTROLS**

It is Dulevo's policy to promote at all levels a culture characterized by awareness of the existence of controls and a control-oriented mentality. There should be a positive attitude toward controls because of the contribution they make to improving efficiency.

By internal controls are meant all the tools necessary or useful for directing, managing, and verifying the activities of the company with the aim of ensuring compliance with laws and company procedures, protecting company assets, managing activities efficiently, and providing accurate and complete accounting and financial data.

The responsibility for creating an effective internal control system is shared at every level of the organisational structure; therefore, all Recipients, within the scope of their roles, are responsible for the development and proper functioning of the control system.

Within their areas of competence, managers are required to be actively involved in the company's control system and to involve their employees in it.

Internal control functions, including the Board of Statutory Auditors, the Supervisory Body, and the appointed Audit Firm, have unrestricted access to the data, documentation and information needed to carry out their work.

### **3.4. PROTECTION OF COMPANY ASSETS**

Everyone should consider themselves a responsible custodian of the tangible and intangible company assets that are instrumental to their work.

No Recipient may make improper use of the Company's assets and resources or allow others to do so.



#### **4. PERSONNEL POLICIES**

##### **4.1. HUMAN RESOURCES**

Human resources are a key element for the existence of the Company. The dedication and professionalism of the Recipients are essential values and conditions for achieving Dulevo's objectives.

The Company expects employees at every level to collaborate in maintaining a workplace environment that fosters mutual respect for the dignity, honour, and reputation of each individual.

##### **4.2. PERSONNEL SELECTION**

Without prejudice to applicable laws and regulations, the evaluation and selection of job candidates are based on the best match between the profiles of the candidates and those envisaged by the recruiters and on the company's needs, in compliance with equal opportunities for all interested parties.

The information requested relates only to the verification of the aspects specified in the professional and psychological-aptitude profile, while respecting the candidate's private sphere and opinions.

The Human Resources department, within the limits of the information available, takes appropriate measures to prevent favouritism, nepotism and any form of cronyism during the selection and hiring process.

##### **4.3. ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP**

Company personnel are hired under regular employment contracts; no form of work that is not in compliance with current legal regulations and national collective labour agreements is allowed, including in reference to foreign citizens residing in the country.

##### **4.4. STAFF MANAGEMENT AND WORK ORGANISATION**

Dulevo avoids any form of discrimination against its employees and collaborators.

Roles and/or responsibilities are assigned based on individual competencies and skills. To the extent compatible with overall work efficiency, flexibility in work organisation is promoted to facilitate maternity arrangements and childcare in general.

Dulevo aims to improve the competencies of all employees and/or self-employed collaborators through targeted training, with the goal of fostering and maintaining the professional level of all personnel.

The involvement of employees and/or collaborators is ensured through regular

information sessions about achieving the company's goals.

In the organisation of work, Dulevo safeguards the value of human resources by providing, when necessary, professional training and/or updating.

The Recipients reject the gang-master system and any form of abuse or mistreatment of workers.

#### **4.5. PROTECTION OF PRIVACY**

Dulevo, in full compliance with current regulations, protects the privacy of all workers and self-employed collaborators. To this end, Dulevo has adopted specific standards that establish rules for the control, by each employee and/or collaborator, of the regulations protecting the personal data of the subjects involved in the processing activities carried out by the Company.

Any investigation into the ideas, preferences, personal tastes, and, in general, private lives of employees and/or self-employed collaborators is strictly prohibited.

#### **4.6. DUTIES OF EMPLOYEES AND COLLABORATORS**

All employees and/or self-employed collaborators undertake to act loyally in the performance of their duties, in compliance with the obligations entered into in the employment contract concluded with Dulevo and as provided for in this Code.

All employees and/or self-employed collaborators must be familiar with and implement the company policies on information security and are required to prepare their documents using clear, objective, and comprehensive language, allowing verification by colleagues, supervisors or authorized external parties.

All employees and/or self-employed collaborators of Dulevo are required to avoid situations that may lead to conflicts of interest and to refrain from taking personal advantage of opportunities they may become aware of during the course of their duties.

All employees and/or self-employed collaborators are required to act diligently to protect company assets, through responsible behaviour and in compliance with the operational procedures and the company directives for regulating their use.

Regarding computer applications, all employees and/or self-employed collaborators are required to:

- adhere scrupulously to the company's security policies in order not to compromise the functionality and protection of the computer systems;
- avoid any unauthorized duplication of programmes installed on computer systems or of data in them;

- not send threatening or abusive email messages, not use coarse language, not make inappropriate comments that may offend individuals and/or harm the company's image;
- not access websites with indecent and offensive content. To this end, Dulevo takes measures to prevent company systems from connecting to websites containing such material.

#### **4.7. HARASSMENT IN THE WORKPLACE**

Dulevo demands that in internal and external work relationships there be no harassment, which includes:

- creating an intimidating, hostile, or isolating work environment for individuals or groups of workers;
- unjustified interference in the performance of other people's work;
- hindering other people's individual work prospects out of personal competitiveness.

The Company prevents, to the best of its ability, and prosecutes mobbing and personal harassment of any kind, including sexual harassment.

#### **4.8. DRUGS AND ALCOHOL ABUSE**

All Dulevo recipients are required to personally contribute to maintaining a work environment that is respectful of people's feelings. Therefore, during work hours and in the workplace it is not permitted to:

- work under the influence of alcohol, drugs or substances with similar effects;
- consume such substances or give away drugs at work for any reason.

The company undertakes to promote the social actions in this area provided for by current legislation.

## 5. HEALTH, SAFETY AND ENVIRONMENT

### 5.1. HYGIENE AND SAFETY AT WORK AND SAFETY IN THE WORKPLACE

Dulevo operates at all levels to ensure its employees' physical and moral integrity, working conditions that respect individual dignity, and healthy and safe working environments, in full compliance with current legislation on the prevention of accidents at work, the protection of workers and workplace safety.

The Company assesses all risks to the health and safety of workers, including through the selection of work equipment and the arrangement of workplaces; its carries out its activities under technical, organisational and economic conditions that ensure adequate accident prevention and a healthy and safe work environment.

All business decisions, of any kind and at any level, about health and safety at work must take into account the following fundamental principles and criteria:

- eliminate risks or, if that is not possible, minimize them making use of the knowledge acquired through technological innovation;
- assess all risks that cannot be eliminated;
- reduce risks at source;
- adapt work to the individual, particularly where the design of work stations and the choice of work equipment and work and manufacturing methods are concerned, with a focus on reducing monotonous and repetitive work and minimizing their effects on health;
- take into account the level of technical development;
- replace what is hazardous with what is not, or is less, hazardous;
- plan prevention, aiming at a coherent system that integrates technology, work organisation, working conditions, social relationships and the influence of work environment factors;
- prioritize collective protection measures over individual protective measures;
- provide workers with adequate instruction.

These principles are used by the Company - and by those responsible for workplace hygiene and safety - to take the necessary measures to protect the health and safety of the workers, including the prevention of occupational risks, information and training, as well as the provision of the necessary organisation and resources.

Dulevo plans prevention, aiming at a coherent system that integrates technology, organisation, working conditions, social relationships and the influence of work environment factors.

Dulevo is committed to promoting and reinforcing a culture of safety among all its employees, fostering awareness of risks, and encouraging responsible behaviour by

all collaborators.

## 5.2. ENVIRONMENT

In the performance of its business activities, Dulevo is committed to contributing to the development and well-being of the communities in which it operates, with the goal of ensuring the health and safety of its employees, external collaborators, customers, and communities affected by its activities, and to reduce its environmental impact.

The environment is a primary asset of the community that Dulevo wants to help safeguard. To this end, the Company aims to strike a balance between economic initiatives and environmental requirements when planning its activities, in compliance with current legal and regulatory provisions.

Recipients of this Code contribute to the environmental protection process. In particular, those involved with assembly of the machines take every step to avoid any illegal discharge or emission of hazardous materials and to handle high-risk waste or processing residues following specific procedures.

Dulevo contributes actively, in the appropriate venues, to the promotion of scientific and technological development to foster environmental protection and the conservation of resources.

As it seeks to improve health and safety conditions in the workplace, operational management must refer to advanced environmental protection and energy efficiency criteria.

Research and technological innovation should be dedicated, in particular, to promoting products and processes that are more and more environmentally friendly and focused on the health and safety of operators.

In the performance of their duties, Dulevo employees participate in the process of risk prevention, environmental protection and the protection of health and safety for themselves, their colleagues, and third parties.

## 6. CONFIDENTIALITY OBLIGATIONS

Dulevo's activities constantly require the acquisition, storage, processing, communication and dissemination of information, documents and other data relating to negotiations, administrative proceedings, financial transactions, know-how (contracts, deeds, reports, notes, studies, drawings, photographs, software, etc.).

Dulevo's databases may contain, among other things, personal data protected by current data protection regulations, as well as data that, due to contractual agreements, cannot be disclosed externally and whose inappropriate or untimely disclosure could harm the Company's interests.

Dulevo is committed to protecting the information relating to its employees and third parties, generated or acquired internally and in business relationships, and to preventing any improper use of this information.

It is the obligation of all Recipients to guarantee the required confidentiality for all information acquired by virtue of their role, work, office or profession. Such information may relate to current and future activities, including information and news that has not yet been released, even is about to be disclosed.

Information and/or any other type of news, documents, or data that are not in the public domain and that pertain to the acts and operations specific to each job or responsibility belong to Dulevo and cannot be used, communicated or disclosed without specific authorization.

Without prejudice to the prohibition of disclosing information relating to the organisation or of using it in a way that could harm it, all Recipients must:

- collect and process only the data necessary and appropriate for the purposes of their role and in direct relation to its functions;
- collect and process such data only using specific procedures;
- store data in such a way as to prevent unauthorized subjects from gaining knowledge of it;
- communicate such data within pre-established procedures and/or with authorization from the responsible managers and, in any case, only after verifying that the data can be disclosed in the specific case;
- verify that there are no absolute or relative restrictions on the disclosure of information regarding third parties connected to Dulevo in any capacity and, if necessary, if needed, obtain their consent;
- associate the data in a way that conveys it as accurately, completely and truthfully as possible to any person authorized to access it.

## 7. USE OF INFORMATION TECHNOLOGY RESOURCES

Computer and electronic resources are fundamental tools for the proper and competitive operation of the company, ensuring the speed, breadth, and accuracy of the information flows necessary for the efficient management and control of business activities.

All information held in the company's computer and electronic systems, including email, is the property of Dulevo and should be used exclusively for carrying out the company's business activities, with the methods and within the limits set out by the company.

To ensure compliance with regulations on the protection of personal data and the prevention and control of computer piracy, the company promotes the correct and limited use of computer and electronic tools, avoiding any use aimed at collecting, storing, and disseminating data and information for purposes other than the company's activities, and avoiding unauthorized access to protected systems; the use of computer and electronic tools is subject to monitoring and checks by the Company in order to prevent any behaviour that may be contrary to legal and regulatory obligations.

## 8. IMPLEMENTATION AND CONTROL

In compliance with current regulations and in the context of planning and managing business activities aimed at efficiency, correctness, transparency, and quality, Dulevo adopts and implements organisation, management and control models (hereinafter referred to as "Models") that include measures to ensure that activities are carried out in compliance with the law and the rules of conduct of this Code. These Models are also designed to promptly detect and eliminate risk situations and prevent behaviours that are illegal or in any case contrary to this Code by anyone acting on behalf of the Company.

Given the complexity of its activities and organisational structure, the Company adopts a system of delegated roles and powers, assigning - in clear and specific terms - responsibilities to persons with the appropriate level of skills and expertise.

The application and continuous monitoring of the Model and of the Code, as well as any updates, are the responsibility of the Board of Directors. The Board is supported by the Supervisory Body, which is entrusted with the broader tasks of:

- monitoring the effectiveness and adequacy of the Model and the Code in relation to the company's structure and its ability to prevent the commission of offences;
- ensuring compliance with the provisions of the Model and the Code by Corporate Bodies, Employees and the other Recipients, in the latter case also through the relevant company departments;
- evaluating updates to the Model and the Code if altered company conditions and/or regulations may require changes to them.



## 9. SANCTIONS FOR VIOLATIONS OF THE CODE OF ETHICS

Violation of the rules of the Code, understood as actions or behaviours that do not comply with the provisions of the Code or as the omission of actions or behaviours described in it, may constitute a breach of the obligations of the employment relationship and be subject to the consequences provided for by current regulations and collective agreements, where applicable, including with regard to the preservation of the employment relationship, and may lead to the payment of damages to the Company.

The types of sanctions are provided for by current regulations or collective agreements. They are proportionate to the severity of the violation and are never such as to harm the dignity of the human person.

Sanctions are imposed by the relevant company department.

As to non-compliance with the provisions of this Ethical Code by consultants, agents, managers, partners, collaborators in general and suppliers of goods or services, the relative sanctions are defined in the respective contractual agreements, which specify the conditions of the relationship.

## 10. REPORTS

The Executive Body sets up suitable communication channels through which any violations of the Code can be reported and dealt with, in compliance with the whistleblowing regulations for protecting the reporting party.

Recipients are required to report all violations of this code of conduct to the Supervisory Body, which is responsible for protecting the confidentiality of the identity of the whistleblower.

The Company has implemented the obligations provided for by the legislation on the reporting of illicit acts (set forth by Legislative Decree 231/2001) and violations of the Model (whistleblowing) through the adoption of a specific procedure, the Whistleblowing Procedure, which is an integral part of the Company's Model 231.