

CODE OF ETHICS



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1. INTRODUCTION

FORGING GROUP MONALE S.r.l. (hereinafter FGM S.r.l.) is a company established in June 2009 by the Wössner family and mainly operates in the field of mechanical processing in general, the production of items using hot metal stamping and forging aluminium parts intended for the car industry and industry in general.

FGM S.r.l. has over thirty years' experience with technicians and workshop staff.

With a view to steady growth and continuous improvement, FGM S.r.l. has obtained the following certifications:


- UNI EN ISO 9001:2015, symbolic of the process to improve production standards and customer satisfaction;
- UNI EN ISO 14001:2015, certifies establishing and maintaining high quality and operational efficiency levels of an environmental management system;

UNI ISO 45001:2018, essential for better oversight of safety compliance, with the aim of safeguarding employees and external stakeholders in terms of health, safety and wellbeing. In 2024, the Company launched an initiative to prepare a Sustainability Report, designed to provide information on its ESG performance. This decision represents the fulfilment of the Company's commitment to economic, environmental, and social sustainability.

In accordance with the provisions of Legislative Decree 231/01, FGM S.R.L. has adopted an Organisational and Management Model (MOG 231) that seeks to prevent crime pursuant to Legislative Decree 231/01 and reduce the associated risk by implementing specific prevention protocols.

Accordingly, the Company appointed a Supervisory Board (hereinafter SB), with autonomous powers of initiative and control, responsible for supervising the effectiveness and compliance of MOG231 (of which this Code of Ethics is an addendum) and its revision.

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2. PURPOSE AND SCOPE OF APPLICATION

This Code of Ethics (hereafter the “Code”) is assigned with the following functions:

- ❖ **legitimacy:** the Code clearly sets out the duties and responsibilities of FGM S.R.L. towards all those that come into contact with the company and vice versa;
- ❖ **cognitive:** the Code helps identify unethical behaviour and indicates the correct operating methods of the functions and the powers attributed to each one;
- ❖ **incentive:** the Code contributes towards developing an ethical conscience and strengthens the reputation of FGM S.R.L. and a relationship of trust with those who come into contact with the Company.

The principles and provisions of this Code are intended for and must be fully understood by all company functions, employees, collaborators and by all those who, in any capacity, have a relationship with FGM S.R.L. (for example, but not limited to, consultants, commercial agents, suppliers, customers, etc..., hereinafter called **Third Parties**).


Therefore, the Code is available for all third parties who have a relationship with the Company and published on the Company website, or in another form deemed appropriate: all parties who have a relationship with the Company shall accept the provisions of the Code and are committed to its compliance.

All company functions, employees, collaborators have an obligation to:

- fully understand and share the principles and values of the Code;
- act in accordance with the standards of ethical conduct referred to by the Code both whilst carrying out their duties and in external relationships, refraining from any conduct contrary to the standards;
- ensure the correct and continual application of the Code at every level of the company, working with relevant company authorities to check and control the Code.

All parties who have a relationship with the Company have an obligation to conduct themselves respectful of the rules of legality, correctness and good faith in accordance with the standards of ethical conduct of this Code.

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3. APPROVAL AND UPDATING THE CODE OF ETHICS


The Code is approved by the Board of Directors and reviewed and updated by the board.

4. ETHICAL BEHAVIOUR PRINCIPLES

All work activities of those who work for FGM S.R.L. must be carried out with professional commitment, moral rigor and correctness, also in order to safeguard the image of the Company

Whilst carrying out their activities, the following standards of ethical conduct should be respected:

- Legality, that is compliance with the laws, regulations, of provisions applicable in Italian law and/or in force in foreign countries in which FGM S.R.L. is located and operates;
- Equality, that is equal treatment, regardless of differences in age, gender, nationality, language, religion, political opinions and personal, economic and social conditions
- Honesty and correctness, that is compliance with the principles of moral integrity, justice and honesty, refraining from reprehensible actions, or which, according to common sense, are contrary to honesty;
- Impartiality, that is adopting objective and unbiased working practices and judgements, without favouritism of any of the parties involved, whether public or private, linked by friendly or unfriendly, blood or affinity relationships
- Transparency, that is full traceability and easy identification of every activity throughout all its steps, so that all relationships are comprehensible, and any relevant actions are justifiable;
- Confidentiality, that is scrupulously refraining from disclosing any company information (whether of technical, logistical, strategic, economic nature) and personal information, in accordance with applicable privacy laws;
- Diligence, that is the performance of assigned tasks in a diligent, precise, attentive and accurate manner.

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5. CODE OF CONDUCT RULES

i. Protection and enrichment of individuals

FGM S.R.L. is committed to enriching the skills and expertise of individuals, by providing suitable tools for professional training, development and growth.


In particular, the Company:

- is committed to delivering functional working conditions that safeguard the physical and mental integrity and wellbeing of individuals and respecting their moral character, avoiding any discrimination, unlawful pressure and undue hardship;
- regards regulatory compliance and continuous improvement as fundamental ethical principles;
- shall ensure that all processes of selection, management and training are based on assessments of professionalism and merit, prohibiting any form of discrimination, direct or indirect¹, relating to gender, language, nationality, religion, political opinions, personal and social conditions, enforcing equal opportunities between men and women, as well as the International Labour Organization (ILO);
- implements a criterion of merit, skill and in any case strictly professional for any decision relating to the working relationship with its own employees and external collaborators; discriminatory practices during selection, training, management, development and payment of individuals, as well as any form of nepotism or favouritism, are strictly prohibited. All recruitment or promotion shall be made in compliance with criteria of merit and skill.

¹ Pursuant to article 25 of Legislative Decree 198/2006 “Italian Code of Equal Opportunities between Men and Women”, **direct discrimination** is defined as any provision, criteria, practice, act, agreement or behaviour, as well as an order to carry out an act or behaviour, which has a detrimental effect by discriminating against female or male workers on the grounds of their sex and, in any case, results in less favourable treatment compared to that of another female or male worker in a similar situation.

Indirect discrimination, on the other hand, occurs when an apparently neutral provision, criteria, practice, act, agreement or behaviour places or is likely to place workers of a certain sex at a particular disadvantage compared with workers of the other sex, unless it relates to requirements that are essential to the performance of the work, provided that the objective is legitimate and the means employed to achieve it are appropriate and necessary.

In any case, any less favourable treatment on the grounds of pregnancy, as well as maternity or paternity, including adoption, or on the grounds of the entitlement to and exercise of the relevant rights, constitutes discrimination.

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- requires managers and all collaborators, within the respective areas of responsibility, to adopt standards of conduct consistent with the regulations set forth in the previous points, functional to their effective implementation;
- shall avoid and condemn any form of vertical upward or downward or horizontal mobbing.

Any activities that may result in the exploitation or forced slavery of any individuals, or any form of child labour are prohibited.

ii. Health and Safety

FGM S.R.L. shall ensure the best possible health and safety conditions in the workplaces to protect the safety of everyone who frequent the company premises, conducting its activities in accordance with applicable national and European legislation relevant to the sector, recognising the important role played by the workplace health and safety and welfare regulations in achieving the Company *Mission*.

To this end, FGM S.r.l. shall share and promote a culture of health and safety through training and information, defining roles and responsibilities and issuing internal procedures to which it expects compliance


The workplace health and safety management system implemented by FGM S.R.L. is based upon compliance with:

- regulations pursuant to Legislative Decree 9/4/08 no. 81 and subsequent amendments and additions thereto, as well as applicable sector regulations;
- fundamental principles of the UNI-INAIL guidelines;
- fundamental principles of the UNI ISO 45001:2018 guidelines.

FGM S.r.l. has also attained the UNI ISO 45001:2018 certification, an important step towards better control of the fulfilment of safety requirements, in order to ensure the health and safety of all workers and third parties.

Everyone is obliged to comply with the regulations and obligations regarding prevention and safety at work, setting themselves in any case objectives of operational excellence that go beyond

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mere compliance with the law, in full knowledge of the value of safeguarding the conditions of health, safety and wellbeing of individuals.

iii. Environmental protection

FGM S.r.l. shall implement a philosophy of environmental responsibility intended to ensure the best conditions possible to protect and respect the environment, conducting its activities in accordance with applicable national and European environmental legislation, recognising the important role played by the principles of the protection of individuals and the environment in achieving the Company Mission.

The Company shall promote environmental protection, as a primary asset and common resource to protect for the benefit of the community and future generations with a view to sustainable development, preventing every form of pollution (ex: environmental, acoustic, water, etc.), assessing the environmental impacts of each production process, limiting the environmental impact of its activities also by using means and technologies that do not damage the environment and its biodiversity, as well as defining roles and responsibilities and issuing internal procedures to which it expects compliance.


The environmental management system of FGM S.R.L. is based on compliance with:

- regulations pursuant to Legislative Decree 3 April 2006, no. 152 and subsequent amendments and additions thereto, as well as applicable sector regulations;
- fundamental principles of the UNI EN ISO 14001:2015 guidelines.

Furthermore, the company has obtained the UNI EN ISO 14001:2015 certification.

Everyone is obliged to comply with regulations and obligations relating to environmental protection, separate waste collection and recycling reusable materials, setting themselves in any case objectives of operational excellence that go beyond mere compliance with the law, in full knowledge of the value represented by environmental protection.

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iv. Anti-corruption policy

FGM S.R.L. maintains and manages relationships with public and private parties in accordance with the law in force, the principles provided for in this Code and internal procedures.

All contact with public and private parties shall be carried with correctness and transparency in order to avoid any conduct aimed, even only partially, at influencing decisions.

It is prohibited to make any payments in kind, gratuities, favours (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing the choices of others or to reach an agreement in this sense or even to raise awareness in a certain sense of third parties, public or private parties.

Payments in kind, gratuities, favours (both direct and indirect), gifts, acts of courtesy and hospitality of modest value made occasionally are only permitted within the sphere of normal courtesy relationships and within the context of local or international customs that match the twofold requirement of insubstantiality (namely of modest symbolic value) and equality (namely of the same cost in the choice of the gift).


In any case, it is prohibited to make any privilege by personal initiative or by drawing from social funds not specially set aside in advance for this purpose; only the governing body of FGM S.R.L. has the power to allocate the relative finances.

Equally, it is prohibited for everyone who works for the Company to receive (or accept the promise) of payments in kind, gratuities, favours (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing the choices or even only to raise awareness in a certain sense.

The Company shall not make any contribution, direct or indirect, under any form, to political parties, movements, committees, organisations and trade unions, to their representatives and candidates, except where permitted and provided for by the laws and regulations in force. In particular, the sponsorship of events, shows, meetings and similar initiatives may only be made if in accordance with the law and the principles of fairness, correctness, transparency and accountability, as well as the internal procedures adopted by FGM S.R.L.

FGM S.R.L. may grant contributions and donations to parties for social, moral, scientific and cultural purposes, refraining where there are possible conflicts of personal or company interest.

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v. *Anti-organised crime policy*

FGM S.R.L. strongly condemns any form of organised crime, including mafia-related crime.

The Company shall ensure the good repute and reliability of business partners (suppliers, consultants, contractors, etc.), including possibly checking that companies are listed on a reference *White list*.

In any case, no commercial relationships shall be undertaken or continued with business partners who are even suspected of belonging to or of being close to criminal organisations, or who are suspected of facilitating in any form, even occasionally, the activities of criminal organisations.

vi. *Conflict of interest*

Everyone who operates on behalf of FGM S.R.L. shall refrain from any activity that could put in contrast personal interests or those of third parties against those of the Company or that may interfere and hinder the ability to make decisions, impartially and objectively, in the interest of FGM S.R.L.

No corporate function shall carry out activities in favour of competitors, nor take on the status of consultant, member of a Board of Directors or Board of Statutory Auditors of competing companies nor provide their professional services in favour of competitors, unless specifically authorised by the Company.


No corporate function shall take advantage of their position to fulfil interests conflicting with those of FGM S.R.L. or rather use – to their advantage of that of Third Parties – information acquired whilst carrying out their work activities in contrast with the interests of FGM S.R.L.

vii. *Data protection*

Personal data is understood as any information that identifies or makes identifiable, directly or indirectly, a natural person or other information relating to their characteristics, habits, lifestyle, personal relationships, state of health, financial situation, etc

FGM S.R.L. shall protect the personal data of everyone who comes into contact with the company, avoiding every improper use of this information and in accordance with data protection and privacy legislation and the regulations governing company internal procedures.

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The Company shall inform all interested parties of the controller that will process the data and the methods and purposes of the processing, ensuring that this is carried out only for the specified, explicit and legitimate purposes indicated and in full compliance with the criteria of lawfulness and correctness of processing.

FGM S.R.L. shall ensure the use of IT systems and software that reduce to a minimum the use of personal and identification data and – where possible – ensure the use of other suitable methods to maintain the anonymity of the parties concerned.

In any case, any information made known to the Company shall be stored only for a period of time strictly necessary for the purposes for which the data is collected and/or subsequently processed and stored using appropriate security measures suitable to reduce to a minimum the risk of disposal, loss, unauthorised access and processing that is not permitted or fails to comply with the purposes of data collection.

viii. Internal relations

All personnel (senior and junior) shall fully collaborate in a reciprocal manner to pursue the Company *Mission* and shall exercise the powers granted to them regarding their duties in a balanced, fair, prudent and non-discriminatory manner.

a) Senior level employees

Senior level employees shall not abuse their position and shall not implement any kind of unfair and/or intimidating conduct towards employees.

The company's corporate bodies, aware of their responsibilities, are guided by the principles set forth in this Code of Ethics, basing their activities on values of honesty, integrity in the pursuit of corporate objectives, loyalty, fairness, respect for people and rules, and mutual cooperation.

The commitment of the Chief Executive Officer and the Chairperson is to lead the company responsibly in pursuit of value creation objectives; the commitment of the Statutory Auditors is to faithfully perform the duties entrusted to them by law. The collaboration between the Chief Executive Officer, the Chairperson, and Sole Auditor is based on a system of shared strategic and operational objectives specific to the Company, in which the various roles of management, coordination,

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direction, and oversight are in harmonious balance. The members of the corporate bodies are required to:

- behave with autonomy and independence, providing accurate information;
- behave with integrity, loyalty and a sense of responsibility towards the company;
- participate assiduously and knowledgeably;
- fully understand their role;
- share in a sense of purpose and a critical mindset, in order to ensure a meaningful personal contribution.

The legitimate expression of differing viewpoints must not be detrimental to the image, prestige, and interests of the Company, which the senior management is responsible for defending and promoting.

The obligations of loyalty and confidentiality assumed upon accepting their positions remain binding on the Sole Auditor, the Chief Executive Officer, and the Chairman even after the termination of their employment with FGM S.r.l.


b) Junior level employees

Without prejudice to the legal and contractual requirements regarding employees' duties, and in particular those relating to workplace health and safety, employees are expected to demonstrate professionalism, dedication, loyalty, a spirit of cooperation and mutual respect. The dynamics characterising the environment in which the Company operates require transparent behaviour. The key factor for success lies in the professional and organisational contribution made by each member of staff.

Every employee or collaborator of FGM:

- shall carry out their work with professionalism, transparency, fairness and honesty, working alongside colleagues, managers and collaborators to achieve shared objectives;
- shall carry out their duties, regardless of the level of responsibility associated with their role, to the highest standard of efficiency, in accordance with the operational instructions issued by senior management;

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- shall comply with instructions issued by senior management and report any situations that contravene current legislation and/or the principles set out in this Code to the relevant company authorities;
- shall align their behaviour, both internally and externally, with the principles and values set out in this Code of Ethics, fully understanding the responsibilities that the company requires them to uphold in the course of their work;
- shall behave towards colleagues in a manner consistent with the principles of civilised coexistence and in full collaboration and cooperation;
- shall regard confidentiality as a fundamental principle of their work;
- shall maintain utmost transparency towards the Supervisory Body.

Furthermore, employees shall commit to mutual support, thereby fostering a working environment that safeguards both the individual and worker, both professionally and in terms of interpersonal relationships.


ix. Transparency of documentation

FGM S.R.L. shall draft and circulate company documentation in full compliance with the principles of truthfulness, completeness and transparency.

Any form of conduct intended to prevent or hinder the exercise of all control or revision activities of company documentation is prohibited.

The Company shall store documentation relating to every transaction carried out (corporate, accounting, etc.), in order to allow, at any time, the traceability of the transaction and identification of the parties that authorised and implemented them.

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x. Protection of free competition

FGM S.R.L. recognises fair competition as an essential part of its growth, for continuous company improvement and to protect its reputation.

The Company expects compliance with the regulatory market standards preventing and avoiding incorrect practices such to distort regular commercial competition.

FGM S.r.l. shall ensure fair conduct and based on good faith, censoring – by way of example and not limited to:


- practices of boycotting, underselling, enticement of employees, theft and use of other business secrets, illegal interference with other distribution systems, parasitic competition as well as every other activity with competitors aimed at stabilising or controlling prices and sales policies or rather interfering in the free distribution of products;
- all ambiguous, incorrect, deceptive or dishonest practices, regardless of the fact that these violate the existing regulations in force;
- every form of hoarding, approaching customers and concluding business affairs in breach of industry regulations and this Code of Ethics.

xi. Protection of intellectual property

All ideas, data and information generated by FGM S.R.L., any patents, trade names and copyright property of FGM S.R.L. shall be protected in accordance with the existing regulations in force.

All those who operate under any capacity on behalf of the Company shall guarantee strict confidentiality and professional secrecy and not disclose or unduly request information regarding documents, know-how, research projects, corporate operations and, in general, concerning all information obtained whilst carrying out their work.

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xii. Management of information and relations with mass media

FGM S.R.L. is committed to ensuring that all external communications are carried out in accordance with the principles of truthfulness, correctness and transparency.

FGM S.R.L. shall manage relations with the press, means of communication and information and, more in general, external stakeholders, in accordance with internal operational procedures and specially appoint individuals for this purpose.

Any request for information by the mass media received by personnel of FGM S.R.L., shall be reported to the individual/corporate function to whom this is expressly designated, who shall, where necessary, to disclose non-confidential information.

Reference is made, to the extent of our competency, to the principles already described in the section dedicated to conflict of interest and in the section dedicated to the protection of intellectual property.


xiii. Use of information technology (IT), means of information and social media

When managing personal social media accounts, everyone shall:

- behave in a manner that does not bring the company into disrepute;
- exercise utmost discretion regarding matters or information whose disclosure could be detrimental or harmful to one’s own safety, that of colleagues, or the company’s reputation; it is prohibited to disclose confidential information (such as internal correspondence, third-party information, or information regarding work activities of which one is aware by virtue of one’s role);
- comply with the limits imposed by law, with particular, but not exclusive, reference to legislation regarding the protection and processing of personal data.

When using company *devices*, measures must be adopted to ensure the safekeeping and safety of all electronic devices and software used.

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6. REPORTING AND VIOLATIONS OF THE CODE

In accordance with Legislative Decree 24/2023 and the ANAC Guidelines, the Company has established an internal *whistleblowing* reporting channel and adopted a relevant *Whistleblowing* Reporting Procedure (to which reference is made), aimed, among other things, at regulating the procedures for reporting unlawful conduct pursuant to Legislative Decree 231/2001 or violations of the MOG 231, of which this Code is a part.

The *Whistleblowing* Office is the sole competent authority responsible for receiving such reports, and operates in accordance with the relevant *Whistleblowing* Reporting Procedure, which also governs the procedures for involving the Supervisory Body in the event of reports of serious unlawful conduct pursuant to Legislative Decree 231/2001 or violations of the MOG 231, of which this Code is a part

In the event of a report of serious unlawful conduct pursuant to Legislative Decree 231/2001 or violations of the MOG 231, of which this Code forms a part, the Supervisory Body shall take action in accordance with the provisions of the MOG 231 (which also provides for a specific Disciplinary System) and the *Whistleblowing* Reporting Procedure.