EUROZAPPA S.R.L.

CODE of ETHICS

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1. Forward

EUROZAPPA (hereinafter also the Company) operates in the production and marketing of components for agricultural machinery in Italy and abroad.

Thanks to extensive experience and know-how gained in over 50 years of activity and the strength of its production centers located in Italy and Croatia, it offers solutions for the agricultural sector, producing forged and pressed parts using a supply chain managed entirely within the Company.

Constant attention to the market and customers, the synergy of skills and technical knowledge, cutting-edge technologies, as well as areas dedicated to research and development have rendered EUROZAPPA capable of offering a range of quality products among the most complete on the market, which respond to the needs of multiple sectors, including automotive, energy and construction.

The Company has always stood out for its integrity, reliability and professionalism in the management of its business.

EUROZAPPA believes in the value of work and considers legality, correctness and transparency of action to be essential pre-requisites for achieving its economic, productive and social objectives.

This document (hereinafter, the "Code of Ethics" or the "Code") identifies the shared values, principles and duties with which EUROZAPPA, all Recipients as defined in the following Paragraph 2, as well as all those who work for this Company must comply, in the belief that ethics in business conduct must be pursued in unison with the success of the Company.

EUROZAPPA ensures the dissemination of the Code of Ethics among the companies directly or indirectly controlled by it.

The value and importance of the Code of Ethics are reinforced by the provisions pertaining to specific individual accountability for offenses and administrative malpractices.

2. Recipients

Observance of the principles and lines of conduct of this Code must guide all participants in the organization of EUROZAPPA and, in particular, the members, administrators, managers, employees, auditors, agents, distributors, partners, consultants, suppliers, collaborators and all those who, directly or indirectly, permanently or temporarily, both in the country and abroad, operate with EUROZAPPA (hereinafter, the "Recipients").

Compliance with the provisions of the Code of Ethics is an integral part of the contractual obligations of Employees. EUROZAPPA requires consultants, collaborators and suppliers to respect the fundamental ethical principles on which this Code is based, also by virtue of specific contractual clauses.

The violation of the Code of Ethics by the Recipients constitutes, depending on the case, a disciplinary offense (sanctioned in compliance with the applicable legislation) and/or a contractual breach and may result in compensation for any damages resulting from such violation against EUROZAPPA.

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The principles expressed in the Code of Ethics represent the common value base and essential non-derogable pre-requisite which must guide, within the scope of their functions, the behavior of all Recipients.

3. Implementation of EUROZAPPA's Code of Ethics

EUROZAPPA is required to conform to the values expressed in this document and to collaborate loyally in the pursuit of its objectives in compliance with the laws and regulatory provisions in force.

Therefore, the Recipients are required to know the content of the Code of Ethics and shall request and receive appropriate clarifications from the Company regarding the interpretations of its content. They must observe it and contribute to its implementation, reporting any shortcomings and/or violations (including any attempts of violation) of which they have become aware. For this purpose, EUROZAPPA may provide specific training/information programs for employees, developed with reference to User's various needs and responsibilities.

4. Compliance with laws and regulations

EUROZAPPA operates in a multinational context and for this reason, requires Recipients to comply with the Laws and Regulations in force in all the countries where it does business, as well as the rules of professional ethics relating to their respective activities.

The foreign companies controlled by EUROZAPPA are obliged to refer to the principles of this Code if its provisions are more stringent than local legislation and not in conflict with it.

5. The Internal control and risk management system at EUROZAPPA

EUROZAPPA undertakes to promote and maintain an appropriate internal auditing and risk management system, adopting and implementing all the necessary tools to direct, manage and verify its business activity to ensure compliance with laws and Company procedures, protect Company assets, optimally and efficiently manage its activity and provide accurate and complete accounting and financial data, and lastly, guarantee correct processes of identification, measurement, management and monitoring of the principal risks for the Company. procedures characterized by awareness of the existence of checks and the assumption of a mindset oriented toward the conscious and voluntary exercise of checks;

EUROZAPPA is responsible for ensuring that, at all levels, there is an internal culture of awareness of the existence of controls and of the need to perform such controls. As a result, management in the first place and all persons employed by EUROZAPPA are required, in any case, to contribute and participate in the system of internal controls and risk management and, with a positive attitude, to involve their collaborators.

The control and supervisory bodies, if appointed, and the auditing companies, if any, entrusted by EUROZAPPA, shall have free access to the data, documentation and information pertinent to carrying out activities of competence.

6. Human Resources

6.1 Professional assessment and selection

People are an indispensable element for the existence of the Company.

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The motivation, commitment and professionalism of management and employees are crucial values and conditions for achieving EUROZAPPA's objectives.

The Company is committed to developing the skills, talents and abilities of management and its employees, so that, in the context of work performance, the energy and creativity of individuals find full expression for the realization of their potential, and to protect the working conditions both in protecting the psycho-physical integrity of the worker and in respecting his/her dignity, following a policy of merit and equal opportunities aimed at promoting the professional growth of each individual. Illicit treatment or creating undue discomfort is not permitted; whereas working conditions which allow the development of professionalism and personal growth are promoted.

EUROZAPPA pursues a policy aimed at recognizing merit, respecting equal opportunities, without any discrimination whatsoever based on sex, racial and ethnic origin, nationality, age, political opinions, religious beliefs, state of health, sexual orientation or economic-social conditions. The selection, classification and career path of Company personnel respond to objective considerations of the professional and personal traits required to perform the job, including the abilities demonstrated in carrying out the same.

The Company ensures that the resources acquired match the profiles required by the Company's needs, avoiding any partiality or facilitation whatsoever and shall base its choices exclusively on the criteria of professionalism and competence.

All EUROZAPPA staff are hired with a regular employment contract and the employment relationship is carried out in compliance with the collective contractual legislation of the sector to which they belong, social security, tax and insurance legislation, as well as provisions on immigration.

No form of irregular work or exploitation of labor is tolerated and respect for human rights is guaranteed.

More generally, EUROZAPPA strives to promote the dignity, health, freedom and equality of workers, in compliance with the relevant legislation (i.e. UN Universal Declaration, OECD Guidelines, etc.).

6.2 Professional development

EUROZAPPA contributes to the training and professional growth of its employees, allowing them to develop their professional competence within the Company.

Each employee must aim to create a stimulating and rewarding work environment which encourages the development of everyone's potential. The employee is therefore required to encourage the acquisition of new skills, abilities and knowledge, as well as to operate in compliance with organizational structures, also in order to allow the correct activation of the internal control chain and the formation of a precise framework of responsibilities.

The heads of each department are instead asked to pay the utmost attention to enhancing and increasing the professionalism of their collaborators by creating conditions to develop their skills and realize their potential.

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6.3 Compensation

Without prejudice to compliance with mandatory rules, the overall remuneration system for employees and managers, whether in cash or benefits, must be defined solely on the basis of assessments relating to professional training, specialized expertise, acquired experience, demonstrated merit and achievement of assigned objectives.

The mere suggestion of an increase in compensation, career progression or any other advantages as compensation for activities in conflict with the law, this Code or the internal rules and regulations, is also prohibited.

6.4 The work environment and protection of privacy

EUROZAPPA undertakes to create a work environment that guarantees all Recipients and, in particular, employees and collaborators, conditions that respect their health, safety and personal dignity and where personal characteristics cannot give rise to discrimination.

Employees must strive to maintain a decent working environment, where everyone's dignity is respected.

In particular, every Employee:

- must never carry out their work under the influence of alcohol or drugs
- must scrupulously comply with the smoking ban in the workplace and, in places where smoking is not prohibited by law, must be sensitive to the needs of those who may feel physical discomfort due to the effects of "second-hand smoke";
- must avoid harassing, offensive or discriminatory behavior towards colleagues or subordinates.

EUROZAPPA undertakes to process the data of all Recipients in full compliance with current national and European legislation on privacy, with specific reference to Regulation (EU) 679/2016, Legislative Decree 101/2018 and Provisions of the Data Protection Authority currently in force.

All EUROZAPPA employees who, as part of their work duties, find themselves processing data, both sensitive and non-sensitive, must always proceed in compliance with the aforementioned legislation and the operating instructions issued by the Company.

EUROZAPPA shall take the appropriate measures to ensure that access to telematic and IT data takes place in absolute compliance with current regulations and privacy laws in order to guarantee safety and confidentiality, and ensures that all information processing will be solely carried out by authorized employees, thus avoiding any undue interference.

6.5 Harassment and mobbing in the workplace

EUROZAPPA promotes initiatives which create working methods geared towards achieving greater organizational well-being. In particular, it requires that internal and external working relations do not give rise to harassment or attitudes attributable to mobbing practices, which are all, without exception, prohibited. They are considered as such:

- creating an intimidating, hostile, isolating or otherwise discriminatory work environment towards individuals or groups of workers;

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- unjustified interference with the performance of other people's work;

- hindering the individual employment prospects of others for mere reasons of personal competitiveness or that of other employees.

Any form of sexual violence or harassment referring to personal or cultural differences is prohibited.

They are considered as such:

- making any decision of relevance for the Recipient's working life conditional upon acceptance of sexual favors or personal and cultural diversity;

- coercing one's collaborators into sexual favors through the influence of one's role;

- proposing private interpersonal relationships, despite an expressed or reasonably evident dislike;

- alluding to disabilities and physical or mental impairments or to forms of cultural, religious or sexual orientation diversity.

6.6 Alcohol or drug abuse

Employees must refrain from carrying out their work under the influence of alcohol or narcotics, or any other substances which have a similar effect, and from consuming such substances during their hours of work. States of chronic dependence on alcohol and drugs which have an impact on work performance and which may disturb the normal course of work will be treated in the same way as previous cases.

7. Ethical conduct in Business

7. 1 General Principles

EUROZAPPA considers the ability to do business with fairness,

integrity, fairness and transparency in compliance with laws, regulations and customs

international.

EUROZAPPA considers as a cornerstone of its business the ability to do business with loyalty, integrity, correctness and transparency in compliance with international laws, regulations and customs.

The Recipients of this Code must recognize and respect the personal dignity, privacy and individual rights and freedoms of all persons.

When conducting business, payments to numbered accounts and otherwise undue giving of money to parties other than the rightful claimant are not permitted under any circumstances.

The Recipients shall work with colleagues of any nationality, culture, religion, race and social class.

The Company guarantees and promotes respect for gender equality and no discrimination of any kind is tolerated.

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The Recipients, in selecting consultants, agents, suppliers, distributors, collaborators and Partners of any kind, must, in particular, verify their reliability and integrity, also based on compliance with the principles contained in this Code of Ethics.

In carrying out their functions, Recipients must maintain conduct inspired by transparency and moral integrity, taking into account the various social, economic, political and cultural contexts of reference and, in particular, the values of honesty, correctness and good faith.

7. 2 Effectiveness, efficiency and cost-effectiveness

EUROZAPPA carries out its activities according to criteria of effectiveness, efficiency and cost-effectiveness through the optimal use of available resources as well as the elimination of waste factors.

Each Recipient must diligently acquire the necessary knowledge of the laws and regulations applicable to the performance of his or her functions, as in force at the time: conduct contrary to the aforementioned precepts shall not be tolerated, nor can lack of knowledge thereof be justified in any way.

7. 3 The Fight against corruption

Since EUROZAPPA's scope of operation also extends to a supranational level, Recipients are required to strictly observe both domestic and international regulations on the fight against corruption both in the public and private sectors.

EUROZAPPA endorses the rules derived from the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions as well as the national and international provisions national and international provisions aimed at preventing and prosecuting corruption. In no way will the belief that one is acting in the interest or for the benefit of EUROZAPPA justify the violation of the rules of adherence to the principles expressed therein.

It is never permissible to receive, pay, or offer, whether directly or indirectly, gifts, payments, material benefits and other advantages or utilities of any amount to third parties, public officials (including foreign officials), public service officers or regional authorities, public employees or to private individuals, in order to influence the actions in their office, not even where these constitute customary or tolerated malpractice, with the purpose of promoting or furthering the interests of EUROZAPPA.

Prohibited conduct includes the offer or receipt by Company personnel or anyone acting on their behalf of a financial advantage or other benefit in connection with business activity. Acts of courtesy are permitted only if provided for by local regulations, provided they are of modest value or otherwise such that they do not compromise the integrity or reputation of either party and cannot be construed as aimed at acquiring improper advantages.

7. 4 Conflicts of interest

All Recipients of the Code of Ethics must avoid any situation that could generate a conflict, even if only potential, of interest with EUROZAPPA or that could create interference in the ability to make impartial decisions in the best interest of the Company.

Information acquired in the performance of assigned duties must remain strictly confidential and may not be disclosed except in compliance with the regulations in force.

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The occurrence of situations of Conflict of Interest, in addition to being contrary to the rules of law and the. principles set out in the Code of Ethics, is detrimental to the image and integrity of the company.

Possible situations of conflict of interest:

- the use of one's position in EUROZAPPA, or of the information acquired during the performance of one's duties, in such a way as to determine a conflict between one's personal interests and those of the Company and result in personal economic advantage;

- the acceptance of money, favors or benefits from persons and/or legal entities that intend to enter into economic agreements with the Company;

- activities that could interfere with the ability to make impartial decisions in safeguarding the best interests of the Company. This also includes cases where the holder of the conflicting interest is not the administrator directly, but the spouse, a close relative or relative-in-law;

- co-interest (overt or covert) in the activities of suppliers or competitors.

Any situation potentially capable of generating a Conflict of Interest, must be immediately communicated to management and, where appropriate, to the Supervisory Board pursuant to Legislative Decree 231/2001 and also determines, for the said Recipient, the obligation to refrain from performing acts in connection with or relating to that situation.

In order to avoid such situations or to prevent them in a timely manner, EUROZAPPA will provide to each Recipient upon commencing the professional relationship an appropriate statement to sign which excludes the presence of conditions of conflict of interest between individual and Company, with a commitment to promptly inform in detail their hierarchical superior, the Company contact or the Supervisory Board ex Legislative Decree 231/2001 if a conflictual situation should arise subsequently in actual or potential situations of conflict of interest. In addition, anyone who becomes aware of conflict of interest situations must promptly notify the Supervisory Board ex Legislative Decree 231/2001 through the dedicated channels.

7. 5 Donations, benefits or other advantages and sponsorships

It is expressly forbidden in dealings with third parties, while conducting the business of EUROZAPPA to offer money, gifts or benefits of any nature aimed at obtaining undue benefits.

In particular, any gifts, hospitality and entertainment expenses offered to public or private parties must under any and all circumstances:

- comply with applicable laws, regulations and procedures;

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- be in accordance with normal business practices, of modest value and in any case such as not to be able to create, in the counterparty or in an unrelated or impartial third party, the impression that their aim is to acquire undue advantages or exert any illicit influence on the counterparty's business and/or decisions;

- not consist of a cash payment.

However, donations of modest value directly attributable to normal, courteous relations and such as not to compromise the image of EUROZAPPA are permitted.

Such donations must be such that they cannot create - in the other party, i.e., in an unrelated and impartial third party - the impression that their aim is to acquire or grant undue advantages, or such that they otherwise create the impression of illegality or immorality. In any case, such donations must always be adequately documented.

In any case, it is forbidden for the Recipient to solicit the offer or concession, that is, the acceptance or receipt, of gifts of any kind, even if of modest value.

In the event that a director, auditor, or employee receives gifts and favorable treatment not directly attributable to normal, courteous relations, he/she must inform the Supervisory Board where appointed and, if applicable, the Department manager, who will inform the Chief Executive Officer.

Any Recipient who, as part of his or her duties, enters into contracts with third parties must ensure that such contracts do not provide for or imply donations in violation of this Code.

EUROZAPPA may provide contributions and sponsorships to support initiatives proposed by public and private entities and nonprofit associations, duly established in accordance with the law.

Sponsorships and contributions may concern events and initiatives of a social, cultural, artistic or sports nature. They may also be aimed at carrying out studies, research, conferences and seminars dealing with issues of interest to EUROZAPPA.

7. 6 Relationships with public administration and public institutions

Relationships with the Public Administration and public institutions (such as, for example, the Antitrust Authority, the Personal Data Protection Authority, etc.) are inspired by principles of utmost fairness, truthfulness, transparency, efficiency and cooperation, in full compliance with the laws and regulations in force and the principles established by the Code of Ethics, so as not to compromise the integrity and reputation of either party.

The aforesaid relationships shall be kept by the departments and persons expressly authorized to do so by the Board of Directors, or by the Director delegated to do so or by the persons delegated by them, in compliance with the provisions of this Code with particular regard to the principles referred to above.

Including but not limited to, the following are prohibited:

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- Promise, offer or in any way pay or provide sums, goods in kind or other benefits (except for gifts or benefits of modest value and in any case in accordance with normal business practice), also as a result of unlawful pressure, in a personal capacity to public officials or private interlocutors, when they are public service appointees, with the aim of promoting or favoring the interests of the Company. The aforementioned requirements cannot be circumvented by resorting to different forms of aid or contributions, such as appointments, consultancies, advertising, sponsorships, employment opportunities, business opportunities of any other kind;

- engaging in such conduct and actions with spouses, relatives or relatives-in-law of the persons mentioned above;

- engaging in conduct otherwise intended to improperly influence the decisions of officials dealing with or making decisions on behalf of the Public Administration;

- provide or promise to provide, solicit or obtain information and/or documents that are confidential or otherwise likely to compromise the integrity or reputation of one or both parties in violation of the principles of transparency and professional fairness;

- have EUROZAPPA represented by an advisor or "third party" when it may create conflicts of interest; in any case they, and their personnel, are subject to the same requirements that bind the Recipients.

The behaviors described are prohibited during business negotiations, requests and relations with the Public Administration and, once business is concluded, with the officials who have dealt with or made decisions on behalf of the Public Administration .

Recipients must ensure that statements and assertions made to public officials are accurate and truthful.

The Managing Director must be immediately informed of any legal action, as well as any communication or injunctions received from Public Authorities.

EUROZAPPA, in selecting independent third parties such as agents, distributors, Partners, suppliers, consultants, collaborators and all those who operate, both in the national territory and in foreign states, in the name and on behalf of the Company, verifies their reliability and integrity, also in function of compliance with the principles contained in this Code.

7. 7 Relationships with suppliers, consultants and partners

EUROZAPPA is guided by the principles of loyalty, correctness, transparency, efficiency, respect for the law and the values expressed in its Code of Ethics and requires similar behavior from all those with whom it has business and/or financial relations of any kind, paying particular attention to this in the choice of negotiating counterparts, suppliers, business partners, consultants, etc.

EUROZAPPA, in particular, refrains from having relations of any nature, even if indirect or through intermediaries, with individuals (individuals or legal entities) who are known to or there is reason to suspect that they are part of or support, whether in Italy or abroad, criminal organizations of any kind, including those of a mafia-like nature, human trafficking or arms trafficking, and individuals or groups operating in terrorist organizations.

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EUROZAPPA also undertakes to not establish relationships of any kind with entities that are known to or there is reason to suspect that they make illegal use of the work of minors or illegally hired personnel or that are otherwise operating in violation of the laws and regulations concerning the protection of workers' rights. Particular attention must be paid in the context of dealings with entities operating in countries where there is no legislation that sufficiently protects workers, in terms of child, female and immigrant labor, by ascertaining the concrete recurrence of sufficient sanitary and safety conditions.

The selection of suppliers of goods or services and, in any case, the purchase of goods and services of any kind are carried out by the specific employees delegated thereto on the basis of objective, transparent and traceable criteria characterized by seriousness, quality, efficiency and cost-effectiveness, and marked by the search for the best balance between economic advantage and quality of service.

In its relations with suppliers, EUROZAPPA is guided by principles of transparency, equality, fairness and free competition.

Specifically, within the scope of these relationships, Recipients are required to:

- operate within the framework of applicable laws and regulations and observe any internal rules and/or procedures for the selection and management of relationships with suppliers;

- establish efficient, transparent and cooperative relationships, maintaining an open and sincere dialogue in line with the best business practices;

- obtain the cooperation of suppliers by constantly ensuring the most convenient relationship between quality, costs and delivery times;

- require the application of contractually agreed conditions;

- require suppliers to comply with the principles of this Code of Ethics and include appropriate provision in contracts.

In the case of suppliers of goods, EUROZAPPA shall verify the correspondence of the goods received with respect to what was actually ordered, as closely as possible.

The selection of external consultants is carried out by the specific employees delegated for this purpose. To this end, Recipients must observe the internal rules for the selection and management of relations with external consultants. The remuneration of external consultants must be strictly commensurate with the performance specified in the contract.

In developing relationships with other Partners through the establishment of new Companies and/or the signing of joint venture agreements and the like, Recipients must comply with the principles of this Code of Ethics when identifying as potential Partners or associates individuals who are of reputable character, are engaged only in lawful activity and are guided by ethical principles similar to those contained in this Code.

The Company recommends that its suppliers, consultants, and Partners refrain from giving gifts of any nature to the Company's governing body and employees such as to exceed normal courtesy practices.

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7.8 Client relationships

EUROZAPPA is constantly striving to meet the needs of its customers by always maintaining the highest levels of quality, performance and reliability.

Recipients should contribute to these policies by identifying customers' needs and seeking to meet their expectations, making the best use of the Company's resources.

In its relations with customers EUROZAPPA is guided by the principles of transparency, equality, fairness and free competition. The Company ensures fairness and clarity in business negotiations and the assumption of contractual obligations, as well as diligent contractual fulfillment.

Specifically, in dealing with customers, all Recipients are required to:

- operate within the framework of applicable laws and regulations and comply with any internal rules and/or procedures for managing customer relations;

- to not discriminate arbitrarily against customers, nor seek to abuse positions of power with them;

- comply with its obligations to customers;

- provide accurate, complete and truthful information.

EUROZAPPA, to protect its customers, does not market goods which it knows are non-compliant.

Any complaints are handled promptly and carefully.

In initiating business relationships and in managing those already in place, Recipients must avoid relations with parties involved in illicit activity or, in any case, lacking the necessary requisites of ethicality and commercial reliability, as well as maintaining financial or business relationships with parties who, even indirectly, hinder human development and contribute to violating fundamental human rights. Recipients must use best diligence to verify and constantly monitor this reliability.

Legal proceedings, settlements and waivers cannot be decided without the favorable opinion of the Managing Director, in accordance with any internal rules and/or procedures. In any case, when handling disputes, situations in which the parties involved in the transactions may find themselves in a conflict of interest must always be avoided.

7.9 Relationships with unions and political organizations and unions

Relationships with political parties, trade unions and other interest-bearing associations are maintained in compliance with the rules of this Code, having particular regard to the principles of impartiality and independence.

Participation on behalf of EUROZAPPA and the payment, in the name of the Company, of any contributions to associations of any kind must be duly authorized by the Board of Directors in compliance with any internal rules and/or practices in force at the time, and may in any case be permitted only with reference to organizations whose aims and objectives are in line with EUROZAPPA's economic and industrial policies and its ethical and behavioral values.

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7.10 Relationships with the media

Information relating to EUROZAPPA and directed to the mass media may be disclosed only by the Company employees delegated thereto, in compliance with the pro tempore - if any - internal rules in force for individuals.

If Recipients are asked to provide information or give interviews, they must communicate this to the Company representative delegated for this purpose and receive specific prior authorisation.

In any case, external communication of data or information must be truthful, transparent and complete and such as to homogeneously reflect the image and strategies adopted by EUROZAPPA, encouraging consensus on Company policies.

7.11 Countering organized crime and terrorism

EUROZAPPA refrains from having relationships of any nature, even if indirect or through a third party, with subjects (individuals or legal entities, authorities, associations, etc.) who are known to or there is reason to suspect are part of or support criminal organizations of any kind, including those of a mafia-like nature, human trafficking, the exploitation of child labor, the smuggling or illicit trafficking of narcotic or psychotropic substances and individuals or groups that operate in terrorist organizations, should be considered as such that may cause serious damage to a country or an international organization, carried out with the intent to intimidate the population or to force public authorities or an international organization to carry out or abstain from carrying out any act or destabilize or destroy the fundamental political, constitutional, economic and social structures of a country or international organization.

7.12 Protection of trademarks, patents and intellectual works and fighting product counterfeiting

EUROZAPPA expressly prohibits any conduct aimed at the alteration, counterfeiting, or misuse of trademarks or distinctive signs and domestic or foreign designs.

It also stigmatizes any conduct aimed at introducing into Italian territory and the other countries where it operates industrial products with altered or counterfeit trademarks or other distinctive signs, as well as the marketing of products with trademarks or distinctive signs that are misleading as to their origin, provenance or the quality of the product.

Likewise, the Company does not tolerate manufacturing, marketing, dissemination or simple use of objects and goods created by usurping or violating industrial property rights.

The protection of intellectual works is considered of primary importance and any illicit distribution, reproduction, use, sale, for any purpose, for any use and with any tool is therefore prohibited.

EUROZAPPA observes the rules of domestic laws, EU regulations and international conventions,and also condemns any conduct aimed at counterfeiting or altering product indications or names of products.

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8. Competition

EUROZAPPA believes in free and fair competition and bases its actions on obtaining competitive results that reward ability, experience and efficiency.

Any action aimed at altering the conditions of correct competition is contrary to EUROZAPPA Company policy and is absolutely prohibited.

Under no circumstances may the pursuit of the Company's interests justify conduct by senior management or collaborators that is not in compliance with applicable local and international regulations and in accordance with the rules of this Code.

Information regarding EUROZAPPA and its activities must be truthful, clear and verifiable in all and every outgoing communication.

9. Accounting Data

9.1 General principles

All Recipients must ensure the utmost truthfulness, transparency and completeness of the information produced in the course of carrying out their duties, each for the part of his or her competence and responsibility. In particular, each Recipient who participates in the formation of the data contained in financial statements, Company reports and all corporate communications must adhere to these principles and diligently verify the accuracy of the information.

Every transaction of economic, financial or patrimonial significance must have an adequate record, and for every transaction there must be duly corroborated by documentary evidence in order to be able to carry out, at any time, checks that attest to the characteristics and the reasons for the operation and to identify who has authorized, carried out, registered and verified the transaction.

All accounting records that form the basis for the preparation of financial statements must be clearly, truthfully and correctly drafted and kept carefully by the departments responsible for their preparation.

Financial statements must be prepared in accordance with the law and must represent EUROZAPPA'S economic, capital and financial situation in a manner that is truthful, clear and complete.

It is strictly prohibited to engage in conduct that may prejudice the transparency and traceability of financial statements.

9. 2 Financial resources

The Company pledges to ensure that every operation and transaction is properly recorded, authorized, verified, legitimate, consistent and fair to guarantee proper registration, appropriate traceability and the possibility to verify the related processes of decision-making, authorization and implementation.

The procurement and disbursement of financial resources, as well as their administration and control, must always comply with local and international regulations, as well as the internal rules and/or practices of approval and authorization set by the Company.

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9. 3 Bookkeeping

Each accounting entry must reflect exactly what is described in the supporting documentation, and this must be complete and subject to verification. In the case of economic/asset items based on valuations, the related entry must be made in accordance with the criteria of reasonableness and appropriateness, clearly illustrating in the relevant documentation the criteria that guided the determination of the value of the asset.

The accounting system is based on generally accepted accounting principles and systematically surveys all events related to EUROZAPPA's business management. Adequate supporting documentation must be kept by administrative management for each accounting entry reflecting a corporate transaction. Adequate documentation must be kept in support of each transaction, allowing for easy accounting records, reconstruction of the transaction, and identification of any responsibilities. Such documentation must allow for identification of the reason for the transaction that generated the detection and the authorization thereof. Supporting documentation must be easily accessible and archived according to appropriate criteria that allow easy consultation by both internal and external control bodies.

Recipients are required to cooperate in the proper and timely recording of accounting entries for all transactions and shall work to ensure that management events are represented correctly and in a timely manner so that the administrative-accounting system can achieve its objectives.

If Recipients become aware of omissions, falsifications or inaccuracies in accounting records, statements made for tax purposes, or acts attributable to them, they are required to promptly inform their superiors and, if necessary, through the latter, the relevant Managing Director.

9.4 Relationships with Auditors

EUROZAPPA bases its relationships with Statutory Auditors, where appointed, or with any other control bodies of the Company required by applicable regulations, with the utmost diligence, professionalism, transparency, collaboration, availability and in full respect of their institutional role, giving punctual and prompt execution of the requirements as well as any other required compliances.

Data and documents provided with accuracy and in clear, objective and exhaustive language so as to provide accurate, complete, faithful and truthful information while avoiding and otherwise reporting, in the appropriate form and manner, situations of conflict of interest.

9. 5 Anti-money laundering

EUROZAPPA conducts its business in full compliance with the current anti-money laundering regulations and provisions issued by the competent Authorities, to this end rejecting any suspicious transaction in terms of fairness and transparency. Particular attention must be paid to relationships involving the receipt or transfer of sums of money or other benefits.

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EUROZAPPA, in order to prevent offenses such as money laundering, refrains from receiving for any reason payments in cash, bearer bonds or through unlicensed intermediaries or through the interposition of third parties in such a way as to make it impossible to identify the disbursing party, or from having relations with parties based or otherwise operating in countries that do not guarantee corporate transparency and, more generally, from carrying out transactions such as to prevent the reconstruction of the financial flow.

The Recipients are required to promptly report to the Supervisory Body - if appointed - or to the Chief Executive Officer any relations with third parties not in line with the provisions of this paragraph.

Recipients are therefore required:

- to check in advance the information available on business counterparties, suppliers, Partners, agents, distributors, collaborators and consultants, in order to ascertain their respectability and the legitimacy of their activities before establishing business relations with them;

- to avoid any involvement in operations that may, even potentially, promote money laundering from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation and any internal rules and/or customary practices;

- not to make payments to parties other than the contractual counterparty or in a country other than that of the parties and/or the place of execution of the contract.

10. Company assets

The use of Company assets, except those expressly assigned as benefits by the Company to Employees, is not permitted for personal use or interest.

Under no circumstances is it permitted to use corporate assets and, in particular, computer and network resources for personal motives or for purposes contrary to the mandatory provisions of law, public order or morality, as well as to commit or induce the commission of crimes or otherwise racial intolerance, glorification of violence or violation of human rights.

The installation of software, or any other modification, on Company assets is not permitted unless authorized and carried out by the appropriate and competent departments or individuals.

No Recipient is permitted to make audiovisual, electronic, paper or photographic recordings or reproductions of Company documents, except in cases where such activities are part of the normal execution of job functions entrusted to him/her.

10.1 Cyber crimes and protection of intellectual property

Recipients are personally responsible for maintaining the security of all IT devices, avoiding the fraudulent or improper use thereof as well as the transfer, including to colleagues, of their access privileges. Moreover, Recipients must comply with the provisions set forth in the internal regulations issued on IT security, including the provisions of the Organizational Model for the Protection of Personal Data prepared by the Company pursuant to EU Regulation 2016/679.

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The use of assets must be exclusively for the purpose of carrying out the Company's activities or for purposes authorized by the managers of the related corporate functions.

It is expressly prohibited

- to use the Company's computer resources for consultation, access and, in general, for any activity involving sites with child pornography content;

- to engage in conduct that in any way may damage, alter, deteriorate or destroy the Company's, or a third party's computer or telematic systems, programs and computer data.

EUROZAPPA is also aware of the importance of intellectual and industrial property and therefore respects and protects its content in all its own and others' forms, whether copyrights, patents, trademarks, etc.

In this regard, it is prohibited to:

- use in any capacity, or make available to the public - without the right - a protected intellectual work, or part thereof, for any purpose and/or in any form;

- use, in any capacity, equipment, products or components, or provide services intended to circumvent technological measures which protect intellectual property;

- use business secrets of others;

- unlawfully reproduce, imitate, or tamper with trademarks, distinctive signs, patents, industrial designs or models falsified by third parties;

11. Confidential information

It is forbidden to disclose to third parties information not known to the public about projects, acquisitions, mergers, business strategies, industrial processes, know-how, industrial secrets and, more generally, information of which they have become aware that concerns the Company, as well as to advise third parties, on the basis of the same, on the execution of any kind of transaction in the financial markets.

It is forbidden to purchase, sell or carry out other financial and/or commercial transactions, including through intermediaries, for the purpose of profiting from them if they are based on or encouraged by the possession of confidential information and in any case information of which the Recipients have become aware by reason of the exercise of their function within EUROZAPPA.

Furthermore, Recipients must not disclose information of any nature regarding EUROZAPPA to the outside world which is not known to the public or whose dissemination could, in any case, be detrimental to the interests of the Company.

EUROZAPPA databases may contain personal data protected by privacy laws.

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EUROZAPPA is committed to protecting the information related to its employees and third parties, as well as to preventing any misuse. The protection of information and data contained or stored in IT media must be ensured by the adoption of security measures suitable for the purpose.

12. Respect for privacy

EUROZAPPA's activities constantly require the acquisition, storage, processing, communication and dissemination of data, documents and information pertaining to negotiations, proceedings, operations and contracts to which EUROZAPPA is a party.

Recipients, by reason of their function, are therefore required to protect the confidentiality and privacy of information learned. All information, knowledge and data acquired or processed by employees through their duties belong to EUROZAPPA and may not be used, communicated or disclosed without the prior and specific authorization of the Data Controller.

Employees shall:

- process data only for the performance of their duties;

- consult only information that is necessary and not in excess of their assigned duties;

- process the data lawfully and fairly, and keep it in a form that enables identification of the data subjects for a period of time not exceeding the achievement of the purposes for which they are processed;

- where possible, verify that the data are accurate and, if necessary, updated;

- conform its processing to the Company's corporate policies and subsequent instructions;

- allow data subjects to fully exercise their rights;

- promptly and without undue delay notify the IT manager or a privacy contact person for the management of the Company's IT systems if their IT device is functioning abnormally or of any incidents relating to data security;

- carefully guard access credentials to electronic devices used in the performance of work activities (username and password);

- comply with all security measures, already in place or subsequently ordered by the Company, designed to avoid risk of destruction, loss, unauthorized access, or unauthorized processing of personal data;

- ensure that, at the end of the working day and when leaving the workplace, any paper documents containing personal data are properly safeguarded;

- while at work, activate the screensaver when leaving one's workstation and turn off the computer at the end of the workday;

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- when necessary, destroy paper documents containing data, using document shredding equipment or, if there is none, shred them so that they can no longer be reassembled;

- control and safeguard paper documents until they are returned to the rightful owner(s) to prevent access by unauthorized persons, and return them upon completion of the entrusted operations;

- maintain strict confidentiality of data of which they have become aware in the performance of their duties;

- determine the private and confidential nature of information in accordance with the requirements of the procedures set by the Company;

- ensure that there are no confidentiality constraints by virtue of relationships of any nature with third parties.

EUROZAPPA, for its part, undertakes to protect the information and data relating to the Recipients and to avoid any misuse thereof, in compliance with the provisions of the regulations on the protection of personal data.

Without prejudice to the above, it is specified that the employee is expressly prohibited, unless expressly and previously authorized by the Company, from:

- carrying out data processing that does not fall within their duties;

- initiating, within the Company, a new processing of personal data or modifying an existing procedure, unless it is done in accordance with the provisions of the Company's privacy procedures and in compliance with the communication flows provided therein,

- communicating or disseminating to third parties (including other employees in the Company), data of which they have become aware in the performance of their duties;

- communicate authentication credentials to third parties;

- create new databases to store data;

- steal computer and/or paper media containing data.

Recipients are obliged to handle personal data in full compliance with privacy laws and in line with the directives given to them by the staff members responsible for data handling procedures.

Personal data, subject to processing only by the entrusted Recipients, must be:

- treated in a lawful, fair and transparent manner with respect to the data subjects (principle of "lawfulness, fairness and transparency");

- collected and recorded for specified, explicit, legitimate purposes and processed in a way that is not incompatible with those purposes (principle of “purpose limitation”);

- adequate, relevant and limited to what is necessary for the purposes for which they are processed ("data minimisation" principle);

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- accurate and up-to-date. All reasonable steps must be taken to delete or rectify in a timely manner data that are inaccurate in relation to the purposes for which they are processed ("accuracy" principle);

- kept in a form that permits identification of the data subject for no longer than is necessary for the purposes for which they were collected and subsequently processed (principle of "limited storage");

- Processed in such a way as to ensure adequate data protection and security (principle of "integrity and confidentiality").

The entrusted Recipients must adopt all appropriate measures to avoid risk of destruction or loss, even accidental, of the aforementioned personal data, unauthorized access to it, processing that is not permitted or that does not comply with the purposes of the collection, as identified and periodically updated within the Company.

13. Safety in the workplace and the environment

13.1 Safety in the workplace

EUROZAPPA is committed to maintaining the highest levels of health and safety and to guarantee all the necessary prevention measures against accidents and illnesses at work, carrying out its activities under technical, organizational and economic conditions such as to provide a work environment compliant with the applicable standards for health and safety, through prevention, continuous monitoring and management of risks related to the performance of professional duties.

All employees must contribute to keeping their work environment healthy and safe.

The basic principles and criteria of prevention, on the basis of which decisions of all kinds and at every level, regarding occupational health and safety, are as follows:

- avoid risks;

- assess risks that cannot be avoided;

- minimize risks utilizing knowledge gained from technical progress;

- combat risks at the source;

- comply with the organizational ergonomics in the workplace and adapt the work to the individual, with particular regard to the design of the workplace, the choice of equipment and the definition of work and production methods, with particular focus on mitigating monotonous and/or repetitive work and reducing the effects of these jobs on one's health;

- take into account the degree of technical development in the adaptation of machines, equipment and any other devices in use;

- replace what is dangerous with what is not dangerous or is less dangerous;

- provide workers with preventive and personal protective equipment appropriate to the working conditions, the worker's needs and requirements and to the risks to be prevented;

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- develop a coherent overall prevention policy that integrates technique, work organization, working conditions, social relations and the influence of factors that affect the work environment;

- give priority to collective protection measures over individual prevention measures;

- give adequate instructions to workers;

- guarantee medical health assessments for workers;

- participate in consultations and periodic meetings regarding the protection of health and safety at work;

- Provide adequate and sufficient information, education and training to workers and managers. Specific education and training must be provided either when the employment relationship is established or when the actual job begins and requires specific knowledge to perform it; when there is a transfer or change of duties, the introduction of new work equipment, new technologies or new hazardous substances and preparations. Training is carried out by an expert and at the workplace. The training of workers and their representatives must be repeated periodically in relation to the evolution of risks or the emergence of new ones. The content of the training must be easily understood by workers and must enable them to acquire the necessary knowledge and skills in occupational health and safety;

-plan the measures deemed appropriate to guarantee the improvement of safety levels over time, also through the adoption of good practices;

- provide emergency measures to be implemented in case of first aid, fire fighting, worker evacuation and serious and immediate danger;

- use warning and safety signs.

All of EUROZAPPA's operations and that of each Recipient, both at top levels when making decisions and at operational levels when implementing them, must be in compliance with the above-mentioned principles.

In addition, workers are required to:

- properly use machinery and equipment, personal protective equipment, and safety devices;

- report any work situation involving serious and immediate danger, as well as any defect in protective systems;

- participate in fulfilling the requirements imposed on health protection to enable the employer to ensure that the working environment and conditions are safe and hazard-free;

- contribute, together with the employer, managers and supervisors, to the fulfillment of the obligations established to protect health and safety in the workplace.

Health and safety protection issues are the subject of specific training initiatives for all employees who, depending on their role, will put into practice the principles articulated in the environmental, health and safety policy.

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EUROZAPPA is committed to monitoring the application of the policy through its facilities and organizations, as well as establishing health and safety objectives and goals and providing systems for monitoring, reporting and periodic reviews.

EUROZAPPA ensures the communication of information to possible contractors on the current specific risks in the work environment and cooperates with them in the implementation of measures of prevention and protection against risks related to the activities being contracted.

13.2 The environment

EUROZAPPA considers respect for the environment a fundamental value and, therefore, is committed to operating in compliance with current legislation, applying the best technologies available.

The Company manages its operations with respect for the environment and public health: investment and business choices embody environmental sustainability with a view to eco-compatible growth also through the adoption of particular technologies and production methods that - where operationally and economically sustainable - make it possible to reduce the environmental impact of its activity.

EUROZAPPA keeps all applicable legal requirements regarding the environmental field under control, working towards their timely compliance also through the involvement and awareness of the personnel directly involved in the management of the impacts generated, as well as of the individuals who, although outside the corporate structure, are linked to the Company through contractual relationships for the management of activities with environmental impact.

The basic principles and criteria of prevention, on the basis of which decisions of all kinds and at all levels are made on environmental protection, are as follows:

- combat risks at the source;

- minimize risks utilizing knowledge gained from technical progress;

- take into account the degree of technological progress;

- provide adequate and sufficient information and training to workers;

- plan measures deemed appropriate to ensure the improvement of environmental protection levels over time;

- regulate the maintenance of equipment and facilities in order to eliminate or reduce pollution;

- minimize waste production and proceed with its recovery and recycling.

- Adopt appropriate environmental management systems to ensure the prevention of environmental risks;

- define specific objectives and improvement programs aimed at minimizing significant environmental impacts;

- provide institutions with all the information necessary to understand any environmental risks related to the Company's activities;

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- develop, where necessary, specific contingency plans.

EUROZAPPA also encourages its collaborators, suppliers and Partners to adhere to the principles on environmental protection set out in this Code of Ethics, urging, where necessary, the adoption of appropriate preventive measures to make them consistent with the Company's environmental policy.

EUROZAPPA's operations must be conducted in accordance with the international standards, laws and regulations of the countries in which it operates that are relative to the protection of the health and safety of workers, the environment and the communities affected by the Company's activity.

Employees must, within the scope of their duties, actively participate in the process of risk prevention, environmental protection and health and safety protection, including through the appropriate use of Company assets. The operational management of industrial activities must refer, in compliance with current legislation on prevention and protection in the workplace, to the most appropriate environmental protection and energy efficiency criteria, in order to reduce their relative impact on the environment.

14. The Guarantor of the Code of Ethics

The responsibility of supervising the function of and compliance with this Code is entrusted by the Board of Directors to an institution or an individual with autonomous powers of initiative and control and appropriate tools to be able to verify and monitor the adequacy and effective implementation as well as its updating of the Code of Ethics (the Guarantor of the Code of Ethics). This entity may be the Supervisory Body established pursuant to Legislative Decree 231/01 (also "Organism" or "SB"), where appointed pursuant to Italian legislation, the board of statutory auditors, or another entity in charge of monitoring.

Without prejudice to compliance with any protection provided for by current regulations or collective agreements and without prejudice to legal requirements, the Guarantor of the Code of Ethics identified in each Company is entitled to receive requests for clarification, complaints and reports of potential or actual violations of this Code. The Guarantor of the Code of Ethics evaluates all reports received, including reports pursuant to Law No. 179/2017 (so-called Whistleblowing), guaranteeing the utmost confidentiality regarding the identity of the whistleblower.

The Guarantor of the Code of Ethics is obliged to maintain maximum confidentiality and operates according to impartiality, authority, continuity, professionalism and autonomy, with broad discretion and with the full support of EUROZAPPA's top management, with which he or she collaborates in absolute independence.

In order to ensure the effectiveness of this Code, EUROZAPPA provides information channels through which all those who become aware of any unlawful conduct carried out within the Company can report, freely, directly and in absolute confidentiality to the respective Guarantor of the Code of Ethics

It is the obligation of each Recipient of this Code to report, without delay, any behavior by any Recipient that does not comply with the principles of the Code of Ethics, as specified below.

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15. Sanctions for violation of the Code

15.1 General principles

Compliance with the rules contained in this Code must be considered an integral part of the contractual obligations established in the relationships between EUROZAPPA and all Recipients.

15.2 The Guarantor of the Code of Ethics and Reporting

Without prejudice to compliance with any protection provided for by law or existing collective agreements and notwithstanding legal obligations, the Guarantor of the Code of Ethics is entitled to receive requests for clarification regarding this Code.

Any violation by the Recipients of the principles and provisions contained in this Code of Ethics must be promptly reported and addressed to the Guarantor in the terms and conditions provided.

Reports can be addressed to the Supervisory Body and made either by ordinary mail in a sealed envelope to the address: Supervisory Body of EUROZAPPA S.p.A. Via Stelloni, 12/B 40010 Sala Bolognese (BO), or by email to the address: odv@eurozappa.com.

Following the reports received, the Guarantor of the Code of Ethics will carry out the related investigations, if necessary with the help of the relevant Company departments, and will inform the authorities responsible for imposing disciplinary sanctions.

All reports received by the Guarantor are handled in absolute confidentiality, under penalty of revocation of the mandate by the members.

Bona fide whistleblowers must be guaranteed against any form of retaliation, discrimination, or penalization, and in all cases the confidentiality of the whistleblower's identity shall be ensured, without prejudice to: i) legal obligations and the protection of the rights of the Company or of persons accused wrongly or in bad faith; ii) the requirements related to the performance of the duties of the Guarantor of the Code of Ethics.

Under no circumstances will the Company take or threaten any action or discrimination of any kind against anyone who reports wrongdoing or expresses concerns regarding ethical issues.

15.3 Penalties

Violation of the principles set forth in the Code of Ethics compromises the fiduciary relationship between the Company and the Recipient.

Therefore, EUROZAPPA, through the bodies and departments specifically appointed for this purpose, shall promptly and immediately impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective violations of the Code and in compliance with the current provisions on the regulation of business relationships, insofar as they are contrary to the principles that guide the Company and insofar as they potentially bear responsibility for the same under the various applicable regulations.

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The effects of violations of the principles set forth in the Code must be taken seriously by all Recipients. To this end, EUROZAPPA shall distribute the Code of Ethics and provide information about the sanctions envisaged in the event of violations and the methods and procedures for imposing them.

The sanctions for Directors and Statutory Auditors, Managers and Employees of EUROZAPPA are consistent with the measures indicated in the National Collective Labour Agreement (hereinafter CCNL) applicable to the Company and are detailed in the same as referred to in the contract, as well as in EUROZAPPA's Model of Organization, Management and Control pursuant to Legislative Decree 231/01 of EUROZAPPA in the section System of Sanctions.

EUROZAPPA's other non-Italian subsidiaries will apply a Sanctioning System in line with that of the Italian Company without prejudice to the different applicable regulations, making the necessary disclosures so that Recipients are in full knowledge of the consequences that ensue from violations of the Code.

The application of disciplinary sanctions is independent of the establishment of any criminal proceedings.

In the event that the above-mentioned Employees are mandated with the power to represent the Company externally, the imposition of a more serious penalty than that of the fine will result in the automatic revocation of the power of attorney itself.

Any violation of the provisions of the Code of Ethics by consultants, suppliers, agents/business brokers and commercial partners, and in any case by third parties, is sanctioned by the competent bodies based on internal corporate rules, as provided by the contractual clauses included in the relevant contracts, and in any case with the application of conventional penalties, which may also include the automatic termination of the contract (pursuant to art. 1456 of the Civil Code), without prejudice to compensation for damages.

Infringements committed by Recipients who are not employees shall be promptly communicated in writing to the Code of Ethics Guarantor by anyone who becomes aware of them. Such infringements are sanctioned by the competent bodies based on internal Company rules and as expressly provided for in the relevant contractual clauses.

16. Revision and promotion of the Code of Ethics

16.1 Distribution of the Code of Ethics

The Code is made available to the Recipients in accordance with the applicable regulations and the type of the relevant contractual relationship in place and is also available on EUROZAPPA's website, www.eruozappa.com.

EUROZAPPA promotes the provision of every possible means of knowledge and clarification for the interpretation and implementation of the Code.

16.2 Revision of the Code

The revision of the Code is approved by the Administrative Body, on the proposal of the Chief Executive Officer and after consulting the Board of Statutory Auditors, if appointed.

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