



CODE OF ETHICS

This Code of Ethics was approved by the Board of Directors of FACO Spa ON MARCH 29, 2024

FOREWORD

THE VISION OF FACO SpA

FACO SpA acknowledges that the authority of a company shall be recognized not only by the competence of its collaborators and by the high quality of the service provided to its customers, but also by the attention paid to the needs of the entire community.

The principles that have always inspired the work of this Company are formally collected in an Ethical Code of Conduct, in the belief that reliability is built daily by respecting rules and valuing people.

Therefore, this Code of Ethics represents towards the market and third parties a distinctive and identifying element, the knowledge and sharing of which, required to all those who work in the Company or who collaborate with it, constitute the foundation of our activity and the first step to contribute to the pursuit of the *vision* of FACO SpA.

Aim of FACO SpA is therefore to pursue excellence in the market in which it operates, through Sustainable Development, safeguarding the Environment and the Safety of the people involved, through the consistency of behaviour that respects Social Ethics, obtaining satisfaction and ensuring added value for the Employee, for the Customer and, in general, for the Community.

PURPOSE AND RECIPIENTS

This Code of Ethics (hereinafter, the "**Code**") illustrates the set of ethical and moral principles that underlie the activity of FACO SpA (hereinafter, the "**Company**") as well as the lines of conduct adopted by the Company both within its business, in relations between employees, and externally, in relations with institutions, suppliers, customers, commercial *partners*, political and trade union organizations as well as the media (hereinafter, altogether the "**Stakeholders**", in its extensive meaning).

Respect for these principles is deemed of fundamental importance in order to achieve the corporate mission of the Company and to guarantee its reputation in the socio-economic context in which it operates.

Preliminarily it is highlighted that the Company firmly believes that every activity must be carried out ethically, recognizing itself in the principle established by the art. 41 of the Italian Constitution, according to which private economic initiative "*cannot be carried out in conflict with social utility or in such a way as to cause damage to security, freedom or human dignity*".

This Code is binding for the Directors, Managers and Employees of the Company, as well as for all those who operate and collaborate, either on a permanent or fixed-term basis, on behalf of the Company (hereinafter, altogether the "**Recipients**").

The Code will be widely disseminated within the internal governance structure, and widely communicated externally as well, including through the Company's website.

The Company also undertakes to adopt any further provisions so that the principles and provisions of the Code can be promptly disclosed and applied.

THE CODE

1 GENERAL PRINCIPLES

The conduct of the Recipients, at all company levels, is based on the principles of legality, correctness, non-discrimination, confidentiality, diligence and loyalty.

1.1 Legality

The Company operates in unconditional compliance with the law and this Code.

All Recipients are therefore required to comply with all applicable regulations and to constantly update themselves on legislative developments, also making use of the training opportunities offered by the Company.

The Company considers the transparency of financial statements and accounting to be a fundamental principle for carrying out its business and protecting its reputation.

1.2 Fairness

Fairness and moral integrity are unwavering duties for all Recipients.

All Recipients are required not to establish any privileged relationship with third parties which is the result of external solicitations aimed at obtaining improper advantages.

In carrying out their activities, the Recipients are required not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any compensation for the purpose of granting advantages to third parties in an improper manner.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer illicit benefits or favours of any kind (except for objects of modest value, or commercial courtesy gifts authorized by the Company) in connection with their activity provided for the benefit of the Company itself.

The intrinsic conviction of acting in the interests of the Company does not exempt the Recipients from the obligation to promptly observe the rules and principles of this Code.

1.3 Non-Discrimination

In the relations with Stakeholders and in particular in the selection and management of personnel, in the work organization, in the choice, selection and management of suppliers, as well as in relations with Authorities and Institutions, the Company avoids and repudiates any discrimination on the grounds of age, sex, race, sexual orientation, state of health, political beliefs, union membership, religion, culture and nationality of its interlocutors.

The company, at the same time, encourages integration, promoting intercultural dialogue and protection of the rights of minorities and vulnerable individuals.

1.4 Confidentiality

The Company undertakes to ensure the protection and confidentiality of the personal data of the Recipients and Stakeholders, in compliance with all applicable regulations regarding the protection of personal data.

Recipients are required not to use confidential information, learned as a result of their work activity, for purposes unrelated to such activity and - in any case - to always act in compliance with the confidentiality obligations assumed by the Company towards all Stakeholders.

In particular, Recipients are required to maintain maximum confidentiality on information in their knowledge, be it oral or documental, able to reveal Company's know-how, transport information, commercial information, and corporate policies, plans and operations.

1.5 Diligence

The relationship between the Company and its employees is based on mutual trust: employees are, therefore, required to work in order to promote the interests of the company, in compliance with the values set out by this Code.

The Recipients must refrain from any activity that could constitute a conflict of interests with the Company, renouncing to the pursuit of personal interests in conflict with the legitimate interests of the Company.

In cases where the possibility of a conflict of interest exists, the Recipients are required to contact their hierarchical superior without delay so that the company can evaluate, and possibly authorise or forbid the potentially conflicting activity.

In cases of violation, the Company will adopt all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

1.6 Loyalty

The Company and the Recipients undertake to achieve fair competition, in compliance with national and community legislation, in the awareness that virtuous competition constitutes a healthy incentive to innovation and development processes, while also protecting the interests of the consumers and the community.

2 RELATIONS WITH PERSONNEL AND COLLABORATORS

2.1 Selection of personnel

The processes of evaluation and selection of personnel are carried out according to fairness and transparency, respecting the principle of equal opportunities, in order to combine the needs of the Company with the professional profiles, ambitions and expectations of candidates.

The Company undertakes to adopt every useful measure to avoid any form of favouritism in the personnel selection process by using objective and meritocratic criteria, respecting the dignity of the candidates as well as in the interest of the good performance of the company.

The hired staff, also through the implementation of this Code, will receive clear and correct information about the roles, responsibilities, rights and duties of the parties.

2.2 Management of personnel

The Company protects and values its human resources, committing itself to maintaining constant the conditions necessary for the professional growth, knowledge and skills of each person, providing the appropriate training for professional updating and any initiative aimed at pursuing this scope.

Without prejudice to duty of maximum availability towards the Company, no worker can be forced to carry out tasks, services or favours that are not due according to their employment contract and their role within the Company.

The Company is firmly committed to battle any episode of mobbing, stalking, psychological violence as well as any behaviour that is discriminatory or harmful to the dignity of any person inside and outside the corporate premises.

Relationships between employees must be carried out on the grounds of loyalty, correctness and mutual respect, in compliance with the values of civil coexistence and freedom of people.

2.3 Equal Opportunities

In accordance with the principles set by the Italian Legislative Decree no. 198/2006, the Company is committed to prohibit any act, agreement or behaviour that may produce a prejudicial effect by discriminating against workers based on their gender and or, in any case, a less favourable treatment compared to that of another worker in a similar situation; equally, in cases of indirect discrimination, when an apparently neutral provision, practice, act, agreement or behavior places or may place workers of a particular gender in a position of particular disadvantage compared to workers of other gender.

The company is also committed to the prohibition of discrimination which must be respected in all moments of working life: access to work, regardless of the hiring method and whatever the sector or branch of activity, at all levels of the professional hierarchy; salary; work performance and career, social security benefits; marriage; pregnancy, maternity and breastfeeding.

2.4 Harassment

Sexual harassment and sexual behaviour or speech that may disturb a person's sensitivity (for example, the display of images with explicit sexual references, insistent and continuous allusions) are not tolerated. With no exception, every employee deserves respect and human dignity. Any behaviour that may violate these rights, even indirectly, and in particular any forms of harassment and/or mobbing is absolutely not tolerated; neither it is tolerated that the employer may have a behaviour that reflects an unfavourable reaction to a complaint or to an action aimed at obtaining compliance with the principle of equal treatment.

3 WORK ENVIRONMENT

The Company is committed to offering its staff a healthy, safe working environment that respects the dignity of

workers.

Safety in the workplace is ensured both by rigorously implementing the provisions of the law in force and by actively promoting the culture of safety through specific training programs. Staff training represents a central element of the management system adopted.

The Company protects the health of its workers, also guaranteeing compliance with hygiene and health prevention regulations.

4 MANAGEMENT OF THE COMPANY

4.1 Compliance with internal procedures

The Company believes that management efficiency and control culture are essential elements for achieving its own objectives.

The Recipients are thus required to strictly observe the company's internal procedures and instructions.

Recipients must act according to their respective authorization profiles and must keep all appropriate documentation to keep track of the actions taken on behalf of the company.

4.2 Accounting management

In the management of accounting activities, recipients are bound to act in compliance with the principles of truthfulness, accuracy and transparency, so that the reputation of the Company is protected both internally and externally.

Furthermore, compliance with these principles also allows the company to plan its operational strategies based on its real economic and financial situation.

All entries reported in the accounting must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity.

In the case of financial or economic elements based on appraisals and estimates, the relevant registration must be inspired by criteria of reasonableness and prudence.

4.3 Assets protection

Each recipient has the responsibility to safeguard, conserve and defend the assets and resources of the company that are entrusted to him/her in the context of his/her activity and must use them in a proper way and in accordance with the company's interests, preventing any improper use.

The Recipients are required to correctly apply the provisions relating to IT security, in order to protect the Company's IT systems from unauthorized access, which could seriously infringe the personal data protection rights of FACO SPA as well as those of its stakeholders.

The recipients undertake not to violate the rights of third parties relating to intellectual property (such as trademarks, patents and copyrights) and must not proceed with use or playing of software or others materials

protected by copyright if not authorized by the Company nor allowed according to license agreements with suppliers.

4.4 Environmental protection

The Company is committed to protecting the environment as a primary asset. To this end, it directs its choices in order to guarantee compatibility between the pursuit of its institutional goals and environmental needs. The Company, consequently, rejects behaviors that deviate from the aforementioned principles; it is aware of the impact of its activities on the economic-social development and quality of life of the reference area. For this reason, the Company, in carrying out its business, is committed to safeguarding the surrounding environment and to contributing to the sustainable development of the territory.

In this context, the Company undertakes to operate in every situation in full compliance with the regulations governing the matter and to limit the environmental impact of its activities, also taking into account the development of scientific research on the subject. The Company guarantees a transparent management of the matter by its Direction, the active participation of all employees and the use of appropriate technologies.

The Company undertakes to promote, within the scope of procurement activities, respect for environmental conditions and to ensure that they are carried out in compliance with ethical principles

4.5 Communication

The Company provides Stakeholders with suitable communication tools through which they can interact with it in order to forward requests, to ask for clarifications or to make complaints.

The Company promotes effective corporate communication capable of putting the company in contact with civil society, in order to implement the community's requirements and needs and to spread its own values and mission.

The information given to Stakeholders is complete and accurate so that recipients are enabled to make correct and informed decisions.

The Company's advertising promotion respects ethical values, protecting minors and repudiating vulgar or offensive messages.

5 EXTERNAL RELATIONS

5.1 Relations with Authorities and Public Administration

Relationships with the Authorities and with the Public Administration must be characterized by maximum clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards.

The Recipients, unless expressly authorized, cannot relate in the name and on behalf of FACO SPA with the Authorities and the Public Administration.

In relations with Public Officials, Public Service Representatives, and the Public Administration in general, the

authorized Recipients must maintain the highest levels of fairness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for himself or the Company.

In this regard, the authorized Recipients will be required to strictly observe the provisions of this Code, as well as, more generally, the provisions of the directives issued by the management of the Company.

5.2 Relations with political organizations e trade unions

The Company does not favour nor discriminate any political or trade union organisation.

The Company refrains from providing any undue contribution in any form to parties, trade unions or other social groups, except for specific exceptions and in any case always within the limits of what is permitted by current regulations.

The Recipients are required to abstain from any direct, indirect or boasted pressure towards political representatives or trade union representatives.

5.3 Relations with customers e providers

The Recipients shall relate to third parties with courtesy, competence and professionalism, in the belief that the protection of the company's image and reputation and consequently the achievement of corporate objectives depend on their conduct.

In particular, Recipients must refrain from any form of unfair or deceptive behaviour that could lead customers or suppliers to rely on unfounded facts or circumstances.

Recipients are required to consistently strive to offer timely and high-quality services to customers, trying to limit any form of disservice or delay in order to maximize customer satisfaction.

Relationships with suppliers are based on loyalty, fairness and transparency. The choice of suppliers is made based on objective criteria of cost-effectiveness, opportunity and efficiency. The choice of suppliers on a purely subjective and personal basis or, in any case, by virtue of interests conflicting with those of the Company is precluded.

The Recipients must implement every possible control so that suppliers and customers are also able to respect the fundamental ethical principles set out in this Code.

6 INTERNAL CONTROL SYSTEM

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within the scope of their respective roles and functions within the company.

All Recipients are invited to report facts and circumstances potentially in conflict with the principles and provisions of this Code to their direct superiors.

The management of the Company and the bodies responsible for this purpose adopt every necessary measure to put an end to the violations, being able to resort to any disciplinary measure in compliance with the law and workers' rights, including trade union rights.

7 SANCTIONING SYSTEM (GUIDELINES)

The internal control system is oriented towards the adoption of tools and methodologies aimed at counteracting potential corporate risks, in order to guarantee compliance not only with the laws, but also with internal provisions and procedures.

In fact, the violation of the principles established in the Code and in the procedures indicated in the internal controls undermines the relationship of trust between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

Such violations will therefore be immediately prosecuted by the Company in an incisive and timely manner, through the adoption of adequate and proportionate disciplinary measures.

The effects of violations of this Code of Ethics and of the internal protocols must be taken into consideration by all those who, on whatever grounds, have relations with the Company.

Depending on the seriousness of the conduct carried out by the person involved in one of the illicit activities envisaged by the Code, the Company will promptly take appropriate measures, notwithstanding any possible penal prosecution by the judicial authorities.

Without prejudice to the above, behaviours in violation of the Code of Ethics may constitute:

- for employees (workers, clerks, managers and managers), a severe breach, entailing sanctions applied depending on the seriousness of the breach, on the grounds of the provisions of the applicable CCNL (National Labour Collective Contract): verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and from salary up to a maximum of three working days, dismissal for just cause or justified reason; in case of pending criminal action or of execution of a measure involving deprivation taken against the employee, before adopting the disciplinary measure, the sanction of suspension from service and remuneration may be adopted, for the duration corresponding to the outcome of the criminal action or until the end of the duration of the measure involving deprivation;
- a just cause for the revocation of the mandate of a Director;
- in the most severe cases, a cause for immediate termination of contracts and relations with external and para-subordinate collaborators;
- in the most severe cases, a cause for immediate termination of contracts and relations with suppliers, contractors and subcontractors.

The identification and application of sanctions will always take into account the general principles of proportionality and adequacy with respect to the contested violation.

In all of the aforementioned cases, FACO SPA also reserves the right to exercise all actions it deems appropriate to compensate for the damage suffered as a result of the behaviour in violation of the Code of Ethics.