

PERWANGER Srl

CODE OF BUSINESS CONDUCT

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Foreword

With this Code of Business Conduct, Perwanger srl has set out to implement a code that enshrines the ethical standards of conduct, as described herein, which are essential for upholding the basic and fundamental values of fairness, responsibility and professionalism.

Everyone who works with Perwanger srl must maintain proper relations with Colleagues, Customers, Suppliers, Institutions and Partners.

The ethical values that inspired this code, as mentioned above, help to safeguard the respectability and integrity of the economic assets and human resources, which both serve to bolster the Company's image in many ways.

The director of Perwanger srl adopts this Code of Business Conduct in order to affirm and disseminate the principles described herein both within the Company and among external Collaborators and Partners.

1 – Recipients

The Recipients of this Code of Business Conduct are the Shareholders, Auditors, Managers, Employees, Collaborators, Consultants, Suppliers, Customers, Partners, Counterparties in contractual relations, and all natural or legal persons who establish relations/relationships with Perwanger srl in the pursuit of common objectives, including on a temporary basis.

2 – General Ethical Principles

2.1 General Business Management

The Recipients' conduct with regard to business management must be characterised by the utmost fairness, transparency, intelligibility and respect for the law, so that anyone dealing with Perwanger srl is able to make autonomous decisions with full awareness of their interests.

Open or personal interpretations of the rules of conduct in this Code of Business Conduct are not permitted in business dealings.

2.2 Conflicts of Interest

Activities involving conflicts of interest that could interfere with the ability to make impartial decisions to the detriment of the Company's interests are to be avoided.

In their relations with Perwanger srl, Recipients must act in compliance with the law and ethical values, and favouritism, corrupt practices or collusion to obtain advantages for themselves or others are absolutely prohibited.

This behaviour includes but is not limited to:

- working for a supplier, customer, or competitor of Perwanger srl or a company that has a business relationship with Perwanger srl while there is an employment relationship with Perwanger srl;
- holding a management position in another company without the prior consent of the director while there is an employment relationship with Perwanger srl;
- having business interests in other companies that may jeopardise the interests of Perwanger srl or restrict their own decision-making ability with regard to their activities at Perwanger srl.



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2.3 Respect for Diversity

Perwanger srl has established itself as a successful business by offering its Collaborators opportunities for growth, innovation and industrial and cultural development, inspired by the principles of integrity and transparency. Diversity is therefore the cornerstone of our organisation, representing integration and the complementary nature of knowledge and skills.

Unequal treatment according to gender, race, political opinion, religious belief, or culture is therefore not permitted at Perwanger srl, because each individual must be evaluated based solely on their own actions within their role and duties; this behaviour is the sole basis for of the relationship between the company and all those who work within it.

It is also necessary for all those who interact with Perwanger srl to maintain a common standard of behaviour that promotes civil coexistence, in accordance with the underlying principles of this Code.

2.4 Prevention of Child Labour

Perwanger srl expressly forbids minors under the age stipulated for employment by Italian law from being employed in its production activities.

It also prohibits the Recipients from establishing business relations with suppliers that employ minors below the age stipulated for employment by Italian law and by the regulations of the location in which the service is provided.

3 – Ethical Principles regarding Third Parties

3.1 Relations with Public Institutions

Company figures who have been expressly appointed or have specific power of attorney are authorised to represent Perwanger srl in relations with Italian and foreign institutional representatives with whom the former comes into contact in the course of its activities.

Such relations must be marked by the principles of impartiality, transparency and fairness, as dictated by law and by the Code of Business Conduct, in part to avoid any conflicts of interest.

Transparency and fairness in the management of relations with Italian or foreign Public Institutions helps to guarantee that situations do not arise in which Group Collaborators promise or directly or indirectly offer money or other benefits to representatives of Institutional Authorities in order to obtain profits or advantages for themselves or for Parties working with Perwanger srl.

3.2 Media Relations

Media relations are essential for conveying facts and data and sharing the activities that make up Perwanger srl' s everyday operations with the public.

Given the sensitive nature of the relationship, it can only be managed by those expressly appointed to this task, as well as by the Company's Director.

Recipients who, in the course of their work for and on behalf of Perwanger srl, are involved in relations with the mass media, must first agree on and/or seek express authorisation from the appointed figures on the content of the communications.

Information communicated externally must be comprehensive, consistent, truthful and transparent.



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3.3 Relations with Customers and Suppliers

Perwanger srl is continuously striving to keep its customers satisfied and meet their needs, as customer satisfaction represents the company's true wealth. This goal requires the constant pursuit of excellence in terms of customer relations, which can only be achieved through ethical values and company procedures.

Suppliers are important partners for Perwanger srl, and it must therefore maintain relations with them based on the principles of fairness and loyalty.

Suppliers must therefore be identified according to objective parameters, including: competence, the quality of the goods and/or services offered, the fairness of the price, as well as the level of support and sharing of corporate objectives and expectations.

Contracts concluded with Suppliers must be based on extremely clear and transparent communications, avoiding commitments that entail an excessive form of prevarication or/and dependence.

To this end, Perwanger srl does not allow its Collaborators to offer or receive gifts or presents of any kind that could in any way influence the transparency and integrity of business relations to/from suppliers with whom they have business relations.

This behaviour includes but is not limited to:

- being an employee of a supplier while there is an employment relationship with Perwanger srl;
- having business interests in supplier companies that may jeopardise the interests of Perwanger srl or restrict their own decision-making ability with regard to their activities at Perwanger srl;
- receiving gifts from suppliers in any form (items, trips, invitations to events, etc.) with a value of more than 50 euros.

The Company reserves the right to verify that the Suppliers it uses operate in compliance with the law and this Code.

3.4 Relations with Competitors

Perwanger srl believes that a modern, free market requires a significant degree of fair competition.

Competitors are one of the variables that an advanced company must contemplate in terms of its development choices and strategies. This aspect must therefore also be addressed while maintaining the principles of the Code of Business Conduct.

In the market, the actions of the commercial area of our Company must be characterised by integrity, fairness, transparency, respect for the law and lively competition.

To this end, Perwanger srl undertakes to respect the principles of fair competition defined by national and EU regulations, reserving the right not to enter into agreements with suppliers who may influence or impair free competition in the market in which they operate by way of their commercial conduct.

4 – Ethical Principles in Governance

4.1 Handling of Confidential Information

Confidential information relating to data, strategies, and corporate objectives must not be acquired and disclosed to outsiders except by the persons expressly appointed to this task.

Confidential information also includes information on products, their development, production processes, commercial strategies and conditions, customers, partnerships, technological and industrial know-how, financial operations, operating results, investments, projects and technical documentation, marketing plans, supplier lists and purchase prices, logistics, IT solutions, and anything else that is part of the knowledge base for developing our business.

Confidential information and materials that Recipients use in the course of their work are the exclusive property of Perwanger srl, which protects their confidentiality and claims their origin.



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In order to protect information on Recipients, Perwanger srl always complies with the provisions imposed by the applicable privacy laws and avoids misuse.

4.2 Handling of Price-Sensitive Information

With regard to confidential information, particular importance is attached to price-sensitive information, i.e. information that is not in the public domain and that, if disclosed, could have a significant influence on prices.

Recipients who, in the performance of their duties, have access to price-sensitive information, may neither disclose it to unauthorised persons, nor use it for their own personal advantage.

Communication of price-sensitive information to an authorised recipient must be made through persons expressly authorised to do so, in compliance with the applicable laws and in accordance with specific corporate provisions.

4.3 Accounting and Management Information

All activities and actions carried out within the work responsibilities of each individual Recipient must be verifiable.

The goal is maximum accounting transparency based on accurate and reliable documentation and accounting records.

Each operation and the varying degrees of responsibility of all those involved to achieve the core objectives must be easily reconstructed.

In accordance with the principles of clear and transparent accounting, Perwanger srl takes care to ensure that its annual financial statements and the accompanying reports are drawn up fairly and truthfully and in compliance with the applicable laws on accounting records.

All those involved in the preparation of the Financial Statements must transparently and truthfully represent the economic, financial and equity situation and provide the supervisory bodies with comprehensive, accurate and truthful information on the Company's financial situation.

In addition to financial statements, all of the above should also be understood as applying to the preparation of accounting data and reports.

4.4 Protection of Quality and the Corporate Image

The quality and efficiency of the company organisation, as well as Perwanger srl's good reputation, are invaluable assets built on years of transparency and honesty.

Conduct that does not comply with the ethical values of this Code, including by an individual, may, in itself, damage the image and reputation our organisation has established in Italy and abroad.

Each Recipient of this Code is therefore obliged to safeguard this corporate asset by way of their conduct and, in particular, to protect of the good reputation of Perwanger srl both inside and outside the workplace.

4.5 Protection of Corporate Assets

Each Recipient is directly and personally responsible for the care, protection, efficiency and preservation of the assets, both tangible and intangible, entrusted to them by the company to perform their duties, as well as for their use of the former in their own manner and in accordance with the company's interests.

Personal use and deployment of the corporate assets, be they tangible or intangible, entrusted to the Recipients to perform their professional duties is prohibited.

Activities outside of the assigned duties that are carried out during working hours are also prohibited.

To this end, it is expressly forbidden to use IT resources for purposes other than those permitted by company security policies or to engage in unlawful conduct.

Perwanger srl precludes the use of software that is not expressly authorised or that is unlicensed or of unlawful origin.

As patents, copyrights, trademarks and trade secrets are our resources, the Company respects its own and others' intellectual property by expressly prohibiting the use of such resources without formal authorisation.

5 – Ethical Principles in Relations with Personnel

5.1 Impartiality in Human Resource Management

Perwanger srl recognises each employee's personal value based on their abilities and potential. Employees are considered a competitive resource, and the company therefore takes care to create a working environment that fosters the personal and professional development of each individual.

The Company has a duty to ensure impartiality and fairness in the selection, recruitment, training and management of its human resources, offering equal professional opportunities to all employees and prohibiting conduct that may appear discriminatory towards others.

All those working at Perwanger srl must be aware that neither prejudice nor discrimination of any kind is involved in the evaluation of individuals, as choices are made according to merit-based criteria.

5.2 Workplace Health and Safety

In order to maintain a culture of safety, Perwanger srl strives to reduce the risks to the physical wellbeing of all its Collaborators through information and training as a means of empowerment, and by providing health and safety protection in the workplace in accordance with the requirements of the applicable regulations.

The Company undertakes to respect and maintain a work environment that prioritises employee health, to never create uncomfortable conditions, including psychological discomfort, and to combat any discriminatory or persecutory attitudes. The appointed figures are responsible for ensuring that the environmental conditions are constantly monitored and in compliance with the relevant laws, adopting all the necessary tools and controls to this end.

The wellbeing of our human resources is a fundamental value for us: harassment and/or behaviour, whether explicit or insinuating, which may offend or upset the dignity, respect and wellbeing, both physical and psychological, of human resources are not allowed or tolerated in any way or to any extent.

6 – Adoption and Updates and/or Amendments to the Code of Business Conduct

This Code of Business Conduct is adopted on 14/04/2023 with immediate effect from that date.

The company undertakes to bring the principles contained in the Code of Business Conduct to the attention of all its employees by effective means appropriate to the purpose.

Any update, amendment or addition to this Code of Business Conduct constitutes a guarantee of its effectiveness and its responsiveness to changes and developments in the context in which it serves as a guide.

Any updates and/or amendments to it that may be necessary must be approved by the director.



7 – Violation of the Code of Business Conduct and the System of Sanctions

The Code of Business Conduct is to be regarded as an integral part of the contractual obligations of Perwanger srl's Managers and Employees.

Violation and non-application, even in part, of the Code of Business Conduct by the Recipients shall constitute a breach of contract and a disciplinary offence under Business Conduct, which may result in disciplinary sanctions proportionate to the seriousness or recidivism of the conduct, in addition to a claim for compensation for the material and image damage suffered by the company, in compliance with the provisions of the applicable employment contracts and the framework in Article 7 of Law no. 300 of 20 May 1970.

Failure to apply all or part of the Code of Business Conduct by non-employee Recipients (Consultants, Suppliers, Partners, etc.) shall constitute sufficient grounds for the termination of their relationship with Perwanger srl.

Today, 14/04/2023

The sole director

Lorenz Perwanger