

	<b>CODE OF ETHICS</b>	
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## 1. INTRODUCTION

The Code of Ethics is the fundamental charter of moral rights and duties that defines the ethical - social responsibility of each member of the corporate organization of Accoppiatura di Asolo Spa.

It constitutes an effective means of preventing irresponsible or possibly illegal behavior by those who work in the name and on behalf of the company because it introduces a clear and explicit definition of the responsibilities of each company operator towards those who are directly or indirectly involved in the activity of the company and that is the stakeholders.

Its recipients are required to strictly and fully respect the values and principles contained therein and are required to protect and preserve, through their conduct, the respectability and image of Accoppiatura di Asolo Spa, as well as the integrity of its economic, social, and human assets.

However, the Code of Ethics does not replace and does not prevail over the laws in force and the existing National Collective Labor Agreement, which retain their expressed and fundamental effectiveness and value.

## 2. GENERAL PRINCIPLES

### 2.1. RECIPIENTS OF THE CODE OF ETHICS

All recipients of this Code of Ethics - members of the Board, employees and external collaborators of Accoppiatura di Asolo Spa - are required to observe, in any situation and context, the contents and inspiring principles in the context of their specific functions, powers and activities.

Each recipient of this Code of Ethics is expressly required to know the content and actively contribute to its implementation.

### 2.2. DIFFUSION AND KNOWLEDGE OF THE CODE OF ETHICS

Accoppiatura di Asolo Spa, undertakes to facilitate and promote the knowledge of the Code of Ethics by its recipients and to scrupulously monitor its observance, providing adequate information, prevention, and control tools to ensure, in any case, the transparency of operations and conduct implemented, intervening, if necessary, with corrective actions.

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Employees are obliged to promptly report to the company management any news they may learn regarding the violation of the rules of the Code of Ethics, so that the company can promptly prepare all the necessary protection initiatives and all the interventions that are in any case useful to bring back the work. to the rules of ethics and to restore compliance with the law, where violated.

### 2.3. FUNDAMENTAL RIGHTS

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Accoppiatura di Asolo Spa acts in its business activities respecting the fundamental rights of everyone, protecting their moral integrity, and ensuring equal opportunities.

Inside, Accoppiatura di Asolo Spa wishes to maintain a serene work environment, in which everyone can work in compliance with the laws, principles and shared values; in particular, it does not tolerate any form of isolation, exploitation or harassment for any cause of discrimination, for personal or work reasons.

Any kind of discrimination based on the diversity of race, language, color, faith and religion, political affiliation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance, economic and social condition is therefore expressly prohibited; concessions of any privileges linked to the reasons listed above are also prohibited, except as provided by the regulations in force.

### 2.4. VALUE OF HUMAN RESOURCES

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Employees, collaborators, and business operators are an indispensable factor for the success of the company. For this reason, Accoppiatura di Asolo Spa protects and promotes the value of human resources to improve and increase the assets and competitiveness of everyone's skills.

Accoppiatura di Asolo Spa believes that healthy competition, understood as a commitment to improvement, represents an indispensable factor for development and progress within a working group context.

The recognition of the results achieved, the professional potential and the skills expressed are central moments in the professional development of the staff of Accoppiatura di Asolo Spa. The selection, training, management, and professional development are therefore carried out without any discrimination, according to criteria of merit, competence, and professionalism. Accoppiatura di Asolo Spa, also offers personnel adequate tools and opportunities for professional growth.

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It considers learning and training a permanent acquisition model, by means of which it is possible to achieve knowledge, understand and effectively interpret change, acquire new ideas, improve productivity, mature individual, and overall company growth.

### 3. SPECIAL RULES: CRITERIA OF CONDUCT

#### 3.1. COMMITMENTS OF THE COMPANY

The corporate bodies of Accoppiatura di Asolo Spa, in the awareness of their responsibilities, are inspired by the principles contained in this Code of Ethics and undertake to orient their business to values of honesty, integrity in pursuit of corporate objectives, loyalty, fairness, respect for people and rules, mutual cooperation.

In particular, the directors undertake to conduct the Company responsibly, in pursuit of value creation objectives.

More precisely Accoppiatura di Asolo Spa undertakes:

- to ensure the maximum dissemination of the Code of Ethics among employees and external collaborators;
- to provide any possible clarification regarding the interpretation and implementation of the rules of the Code of Ethics and in particular as regards its application in company procedures;

Accoppiatura di Asolo Spa also guarantees the protection and safety in the workplace for its staff and third parties, committing itself to compliance with workplace safety regulations and to promoting the safety of all the places that make up the work environment itself.

Accoppiatura di Asolo Spa is committed to spreading and consolidating a solid culture and environmental awareness, always operating in compliance with the laws in force and applying the best technologies available

#### 3.2. SPECIFIC DUTIES OF THE MANAGERS OF COMPANY FUNCTIONS

Each sector manager or company function supports the professional growth of the assigned resources,

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considering the aptitudes of each in the assignment of tasks, in order to achieve real efficiency in the operational area.

Each sector manager or company function pays due attention and, where possible and appropriate, follows up on suggestions or requests from their collaborators, with a view to total quality, encouraging motivated participation in the company's activities.

### 3.3. DUTIES OF THE EMPLOYEES

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Without prejudice to the legal and contractual provisions regarding the duties of workers, employees are required professionalism, honesty, dedication, loyalty, a spirit of collaboration and mutual respect.

The dynamics that characterize the context in which the company operates require the adoption of transparent behaviours. The main success factor is given by the professional and organizational contribution that each of the human resources involved ensures.

Each company employee has the responsibility to acquire knowledge of the laws and regulations that affect their duties in order to recognize potential risks and know when to ask for company support.

### 3.4. USE OF COMPANY MEANS AND TOOLS

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The employee is required to ensure maximum compliance with the infrastructure, means, tools and materials of the company, promptly reporting to their manager any non-compliant use of such equipment that they believe others make.

The employee is required to use the company's equipment only for the performance of the job duties for which he is in charge. It is therefore strictly forbidden for employees to act with company means, whether they are IT, technical or of any other type, for the achievement of private purposes or interests or in competition with company activities.

### 3.5. CONFLICT OF INTEREST

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In order to avoid conflicts of interest, each operation and activity must be undertaken solely and exclusively in the interest of the company and in a lawful, transparent, and correct manner.

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Therefore, Accoppiatura di Asolo Spa requires all interested parties to:

- Declare any conflicts of interest, real or potential, before being involved in the operation, activity or relationship that leads to the reportable situation.
- Disclose actual or potential conflicts of interest during the hiring process.
- Ask your manager or social ethics manager (HR office) how to manage a conflict of interest, rather than just relying on your own interpretation, as our self-assessment can be altered by the context.

The methods of reporting by the interested party to the highest governing body are as follows:

1. Use the suggestion box
2. write an e-mail dedicated to the address [info@asoltex.com](mailto:info@asoltex.com)
3. contact your manager directly
4. contact the social ethics manager (HR office).

### 3.6. CONFIDENTIALITY

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The employee and external collaborators is required to maintain the strictest and absolute confidentiality on all information relating to the company and / or its employees of which he is aware by virtue of his work activity.

This is in order to avoid the disclosure of confidential information relating to the organization, production methods and any other information whose disclosure could cause damage to the company.

In particular, the staff must:

- acquire and process only the data necessary and appropriate for the purposes directly attributable to the function performed;
- acquire and process the data only within specific procedures;
- keep the data in such a way as to prevent unauthorized others from gaining knowledge of it;
- communicate the data in the context of pre-established procedures and / or with the explicit authorization of superiors;

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- ensure that there are no restrictions on the possible disclosure of information regarding third parties connected to the company by a relationship of any nature and, if necessary, obtain their consent.

### 3.7. COMPLIANCE WITH THE LAW ON FREE COMPETITION

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It is contrary to the company's policy to have information exchanges and / or agreements with any competitor regarding prices, pricing policies, discounts, promotions, conditions of sale, production costs.

Each employee or collaborator who works in the field of commercial activity is therefore invited to submit to the Management any doubt or initiative that may fall within the cases sanctioned by law, in order to operate in full compliance with the rules.

### 3.8. RELATIONS WITH SUPPLIERS

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In procurement relationships and, in general, the supply of goods and / or services, employees are obliged to:

- observe the internal procedures for the selection and management of relations with suppliers;
- obtain the collaboration of suppliers in constantly ensuring the satisfaction of customer needs in terms of quality, cost, and delivery times;
- observe and enforce the contractual conditions and maintain a frank and open dialogue with suppliers, in line with good business practices;
- bring any problems with a supplier to management so that the consequences can be assessed.

### 3.9. RELATIONS WITH CUSTOMERS

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The customer is the heart of the business.

Company employees are required to:

- observe internal procedures for managing relationships with customers;

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- provide accurate and exhaustive information about the products and services offered so that the customer can make informed decisions;
- be truthful in advertising or other communications.

### 3.10. RELATIONS WITH PUBLIC INSTITUTIONS

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In relations with the Public Administration, the employee who, by virtue of the duties performed within the company, is in charge of requesting, managing and / or administering grants, subsidies or loans from the State or other public body is required , within the limits of its functions, to ensure that the aforementioned relationships are intended for the purposes for which they were requested and to maintain accurate documentation of each operation, which ensures maximum transparency and clarity of the related money movements.

### 3.11. RELATIONS WITH THE INFORMATION BODIES

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The company and all its employees and collaborators, including external collaborators, must ensure that the image of Accoppiatura di Asolo Spa is in keeping with the prestige and importance of the role that the company has on the national and international scene.

Relations with the media are reserved exclusively for the corporate functions and responsibilities delegated to do so and are previously agreed with them.

### 3.12. ACCOUNTING TRANSPARENCY

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Each operation and transaction must be correctly recorded, authorized, verifiable, legitimate, consistent, and congruous. All actions and operations must be adequately recorded, and it must be possible to verify the decision, authorization, and execution process.

Accounting transparency is based on the accuracy, completeness, and authorization of the basic information for the related accounting records. Each employee is required to collaborate so that the management facts are correctly and promptly represented in the accounts.

For each operation, adequate supporting documentation of the activity carried out is kept in order to allow easy accounting registration, identification of the different levels of responsibility and accurate

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reconstruction of the operation, also to reduce the likelihood of interpretative errors. Each record must reflect exactly what is shown in the supporting documentation.

The use of company funds for illegal or improper purposes is strictly prohibited.

Payments not based on suitably authorized corporate transactions or illegal forms of remuneration must be paid to no one and for no reason.

Any neglect, omission or falsification of which employees become aware, must be promptly reported to the management who will intervene by reporting the offense to the competent bodies.

### 3.13. MARKETING ACTIVITIES

In marketing campaigns Accoppiatura di Asolo spa undertakes to provide only information corresponding to reality.

It also undertakes to comply with the Privacy law regarding addresses and other information relating to the target audience of the campaigns by providing the possibility, to anyone who requests it, to have information on how their name was found and offering the possibility of cancellation from the lists.

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