CODE OF ETHICS

Approved by the Board of Directors of Ballestra S.p.A. on September 12th, 2023

FIRST SECTION

INTRODUCTION....4

ADDRESSEES AND SCOPE....5

CONTEXT AND PURPOSE OF THE CODE....5

Purpose, adoption and revision....5

Code of Ethics as a reference for general and behavioural principles....6

Commitment of the Addressees to respect the principles and rules of conduct....6

Compliance with regulations....6

SECOND SECTION

ETHICAL PRINCIPLES....7

Legality....7

Integrity....7

Trust and loyalty from Employees....7

Confidentiality and protection of intellectual property....7

Respect and protection of the person and human rights....8

Environmental protection....8

Professionalism and excellence....8

Transparency and accuracy in accounting and management information....9

Internal control....9

Social dialogue / Local communities....9

RULES OF CONDUCT IN THE MANAGEMENT OF BUSINESS ACTIVITIES....9

Anti-corruption....9

Choice of third parties....10

Donations and gifts....10

Conflict of interest....11

Protection of personal data (Privacy)....12

CRITERIA FOR CONDUCTING RELATIONS WITH STAKEHOLDERS....12

Customer Relations....12

Relations with Shareholders....13

Relations with Employees and Collaborators....13

Relations with Suppliers....15

Relations with Public Administration and Public Institutions 16
Relations with political and trade union organisations 16

THIRD SECTION

CIRCULATION AND TRAINING..... 16
Circulation among addressees.....16
Training.....17

COMMITMENT TO THE CODE 17

BREACHES OF THE Errore. Il segnalibro non è definito.
Consequences of breaching the Code of Ethics for Employees.....17
Consequences of breaching the Code of Ethics for Directors and Staturoty Auditors 17
Consequences of breaching the Code of Ethics for Collaborators and Suppliers.....18

REPORTING A BREACH OF THE CODE OF ETHICS 18

GLOSSARY.....18

FIRST SECTION

FOREWORD

Ballestra S.p.A. (hereinafter, simply, Ballestra), based in Milan, Via Piero Portaluppi 17, is a private company that operates in the design and construction of plants and machinery for the production of surfactants, detergents, soaps and a wide range of organic and inorganic chemistry products, either using its own technology and know-how and/or under license.

DB Finanziaria S.p.A. (hereinafter, simply, DBF), a company that controls 100% Ballestra, is a holding company founded in 2007 whose main activity is to manage and hold investments in order to direct and coordinate the activities of the subsidiaries also through the provision of managerial and technical services.

Ballestra operates on the world market with the aim of being a reliable partner of its customers, through the following methods:

- propose technologically advanced solutions built on customer needs;
- follow maximum security criteria;
- follow sustainability criteria, both in terms of environmental impact and social responsibility issues;
- ensure a healthy and safe working environment;
- optimize economic and financial results;
- enhance human capital as a strategic asset of the company.

This Code of Ethics incorporates the ethical principles and values on which Ballestra's identity and culture are based, highlighting the set of rights, duties and responsibilities of all those who, for any reason, work within it or collaborate with it.
This Code of Ethics expresses the lines of conduct that allow these values to be implemented in the context of the Company's activities and in the conduct of the Company's business and which take as guiding principles the compliance with the law in Italy and in the countries in which it operates, as well as with Company rules within a framework of integrity, correctness and confidentiality. The Company also aims to reconcile the search for competitiveness on the market with the evolution of technologies and to promote the correct and functional use of resources.
The Code of Ethics is conceived as a guide and support for decision-making processes and clarifies the behavior that should be adopted for helping Addressees to carry out their activities with honesty, integrity and responsibility.

Ballestra undertakes to circulate the Code, to its periodic updating and to making every possible means available to ensure that the Code is fully applied.
This Code is an integral part of the "Organization and Management Model" adopted by Ballestra according to the interpretation given by art. 6 of Legislative Decree 231/2001 from the Guidelines of Confindustria.

ADDRESSEES AND SCOPE

The Code of Ethics applies to Ballestra and to its companies directly and indirectly controlled in Italy and abroad and to its parent company DBF ("Affiliates"). The rules of the Code of Ethics apply, without exception, to the Board of Directors, the Board of Statutory Auditors, the Supervisory Body, the Independent Auditors, all the employees of the Company and all those who, directly or indirectly, permanently or temporarily, enter into agreements or relations or work on behalf or in the interest of the Company and its Affiliates (hereinafter the "Addressees").
The Company must adequately inform the Addressees about the obligations imposed by the Code of Ethics, demand compliance with them - or require compliance with equivalent standards - and take appropriate initiatives in the event of non-compliance.
Affiliates are required to adopt the Code of Ethics by resolution of the Board of Directors (or equivalent administrative body) and to enforce its contents, guaranteeing its application with the measures deemed most appropriate, also taking into account local laws and customs. Therefore:
-if local laws/customs impose higher standards than those indicated by the Code of Ethics, local laws and customs will be applied;
-if the Code of Ethics provides for higher standards, the latter will prevail.

CONTEXT AND PURPOSE OF THE CODE

Purpose, adoption and revision

This Code of Ethics represents the fundamental principles that inspire the Company and arises from the need to implement a set of rules of conduct based on the fundamental values of ethics that regulate the fulfillment of work performance by the Addressees.

It is an essential element of the Company's integrated management systems, with particular reference to:

- the Organisation, Management and Control Model adopted by the Company in implementation of Legislative Decree 231/01 (hereinafter the "Model");
- the management for social and environmental sustainability;
- the compliance management.

Ballestra has set up an internal Supervisory Body ("SB") with autonomous powers of initiative and control. This Body has been entrusted with the task of supervising the functioning and compliance with the Model and communicating the updates to be made to it.

In addition, the Supervisory Body has been entrusted with the task of promoting the circulations and knowledge of the Code of Ethics and of taking care of its application and updating, taking action, on its own initiative or upon notification, to prevent or repress, through the competent company departments (eg Human Resources, Legal Department, etc.), any violations of the same.

Any future updates to this Code of Ethics, due to regulatory adjustments, to the assessments of the Supervisory Body, to the internal control bodies and Stakeholders, must be approved by the Company's Administrative Body and promptly disseminated to all Addressees.

Code of Ethics as a reference for general and behavioral principles

The Code of Ethics contains the general principles to which the Company recognizes positive ethical value and to which all the Addressees of the Code must comply, for two purposes:

- to "guide" the Addressees on the lines of conduct to follow and those to avoid;
- to identify responsibilities and possible consequences in terms of sanctions, where applicable.

Commitment of the Addressees to respect the principles and rules of conduct

For a full achievement of corporate objectives, the Company requests to always operate in a context of fair competition, with fairness and good faith, respecting the legitimate interests of its Stakeholders.

It is therefore necessary for those who work in the Company or on behalf of the Company to respect the ethical and behavioural principles of the Company and to ensure that those are respected within the scope of their functions and responsibilities.

Compliance with regulations

The Company, in carrying out its activities, requests the Addressees to put respect for the law and human dignity before any other interest or objective and, in particular, for areas within their competence, to comply with:

a) the applicable laws and regulations;

b) the provisions of the Articles of Association;

c) this Code of Ethics;

d) the International Charter of Human Rights;

e) company rules, procedures and policies;

f) communications and circulars of Management and other company functions, as well as of the Operating Committees where established.

SECOND SECTION

ETHICAL PRINCIPLES

The Company's Code of Ethics demonstrates its commitment to compliance with rules and regulations and the issues of corporate responsibility, which are fundamental in order to develop a model of conduct based on ethics, in line with corporate strategies and the achievement and continuity of economic and social results.

Legality

The Addressees are asked to read the general or sectoral laws in force both in Italy and in the foreign countries in which the Company operates and to behave in a respectful manner of the same. No complacency or tolerance shall be reserved for occasional or structural forms of non-compliance with the law, known or knowable, even if it may be in place for the benefit of the Company itself.

In relations between the Company and third parties, the Addressees must act according to ethical and legal rules. Relationships must be managed without resorting to illicit means.

Practices of corruption, illegitimate favors, collusive behavior, solicitations of personal advantages for oneself or for others are explicitly prohibited.

Integrity

Relationships and behaviour at all levels must be based on the principles of honesty, fairness, integrity and transparency, as well as be open to scrutiny and based on correct and complete information.

Trust and loyalty from Employees

The Company maintains a relationship of trust and mutual loyalty with each of its Employees.

In this sense, the obligation of loyalty entails for each Employee the prohibition to carry out activities that are in any case contrary to the interests of the Company or incompatible with their official duties.

Finally, all Employees, in the context of the relationship of trust and loyalty, must consider compliance with the Code of Ethics as an essential part of the contractual obligations with the Company where they work.

Confidentiality and protection of intellectual property

The Company undertakes to protect the information relating to its personnel and to the data, generated or acquired in business relationships and to avoid any misuse of this information.

The Company intends and guarantees that the processing of personal data takes place in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties, as required by current regulations.

Information that has a confidential character relating to data or knowledge belonging to the Company must not be acquired, used or communicated except by authorized persons and in compliance with existing confidentiality duties.

By way of example and not exhaustive, the following are considered confidential information: work projects, including commercial, industrial and strategic plans; requests for quotations and commercial activities; company databases; technical documentation and information on know-how and technological processes; financial transactions; prices charged and costs of materials and services; operational strategies; investment and divestment strategies; operating results; personal data of employees and lists of customers, suppliers and collaborators.

The Company also undertakes not to carry out projects and/or initiatives that may result in violation of the intellectual property rights of third parties.

Respect and protection of the person and human rights

The Company, in the countries in which it operates, carries out its activities in accordance with current legislation on the protection of working conditions and undertakes to conduct its activities based on risk prevention and the protection of the health and safety for any internal and external workers of the Companies.

The Company is committed to ensuring that relations between Employees are based on the principles of civil coexistence and take place in mutual respect for the rights and freedom of persons. In particular, discrimination or retaliation must not be made on grounds of nationality, religious belief, political and trade union affiliation, language, gender and sexual orientation.

In this sense, each Addressee must actively collaborate to maintain a climate of mutual respect for the dignity, honor and reputation of each one. Even the language in the workplace, therefore, must be inspired by criteria of good education and respect for others.

Relations between the different levels of responsibility must be conducted with loyalty and fairness, respecting official secrecy. The heads of the organizational units must exercise the powers related to their function with objectivity and balance, adequately taking care of the well-being and professional growth of their collaborators, respecting equal opportunities and the enhancement of the characteristics of individuals. In turn, all Employees must cooperate fully with their managers and diligently observe the working arrangements given to them.

Environmental protection

The Company is sensitive to environmental issues and is aware of the strategic role of the environment as an asset of common interest, as well as a tool for business enhancement.

This attention is paid both to internal activities and to the process of realization and technological improvement of the product.

The Addressees, in carrying out their functions and within the limits of their competences, are required to comply with current legislation on environmental protection and protection and also promote the conduct of their activities focused on the correct use of resources and respect for the environment.

The Company also encourages a policy of sober and conscious consumption, aimed at avoiding waste and minimizing impacts, compatible with other legitimate work needs.

Professionalism and excellence

The Company, leader in the national and international market in technologies for the detergents, soap

and some applications of chemistry, is careful to maintain a level of excellence of its resources and to make use of equally high external skills, in order to guarantee a high quality level of the services offered. Therefore, the skills and professionalism made available meet the necessary requirements to best meet the expectations of the reference market.

Transparency and accuracy in accounting and management information

The Company requires that the operations or transactions carried out in the course of all its activities are correctly and promptly recorded in the accounting system, according to the criteria dictated by law and by the accounting principles applied.

The information that flows into periodic "reports" and / or accounts, both general and analytical, must adhere to the principles of transparency, fairness, completeness and accuracy. All reporting information (such as expense reports, invoice transmissions, inventory surveys, etc.) must be accurate, true and prompt and must provide a faithful representation of the facts.

Every type of activity or transaction carried out by the Addressees must be based on adequate documentation and be reasonably verifiable.
The Addressees must also ensure that there is a certain separation of tasks between those who take or implement decisions (top management), those who must provide accounting evidence of the operations decided (accounts) and those who are required to carry out on them the controls required by law and by the procedures contemplated by the internal control system.

Internal control

The Company promotes and spreads, at all levels, a culture oriented towards the conscious and voluntary exercise of controls in compliance with the Privacy, being aware of the contributions they make to the achievement of company objectives and efficiency.

The responsibility for creating an effective internal control system is therefore common to each operational level. Consequently, all the employees are responsible for defining, implementing and correctly functioning the controls inherent in the operational areas entrusted to them.

Social dialogue / Local communities

The Company promotes dialogue and interaction between all internal and external stakeholders, convinced that a climate of collaboration and mutual attention can bring significant benefits both to their work activities and to the individual and collective well-being of the parties concerned and to the maintenance of a healthy social fabric.

RULES OF CONDUCT IN THE MANAGEMENT OF BUSINESS ACTIVITIES

Anti-corruption

Company's activities and relations with Addressees and third parties in general must be based on legality, integrity, correctness, transparency and loyalty. Practices aimed at promoting and/or facilitating and/or carrying out any behaviour, active or passive, from which an illegitimate or illicit benefit derives or may derive in favour of oneself and/or third parties are not permitted. The Company affirms the principle of "zero tolerance" towards any form of corruption and any behavior that may

be aimed at improperly obtaining advantages or favors from third parties. In this regard, by way of example, the Addressees must not:

- exploit existing relationships with persons who hold the role of public official or public service officer, in order to carry out an illegal mediation work,

- directly or indirectly, also through third parties, offer money or other benefits not due to directors, general managers, managers responsible for preparing the company's accounting documents, auditors and liquidators or to persons subject to the direction or supervision of the aforementioned subjects, of client or supplier companies, or of other public or private body, in order to obtain an interest or advantage of any kind, including obtaining or maintaining business/business benefits for or on behalf of the Company;

- directly or indirectly, including through an intermediary, request or accept money **or** other benefits from customers, suppliers, or other person seeking an undue advantage of any kind in return.

Addressees are expressly prohibited from making or facilitating payments to expedite or facilitate the execution by any public official of any governmental act.

If an employee is faced with the crossroads between being involved in an activity involving the commission of an act of corruption and concluding, through the exploitation of that activity**,** a deal in the interest or for the benefit of the Company, he must choose to give up the deal.

The Company also expects all third parties dealing with the Company to apply the highest ethical standards in their business relations and to have an adequate anti-corruption program in place.

Selection and management of third parties

The Company selects partners, collaborators and suppliers by carefully evaluating the latter's compliance with the regulations with particular reference to those relating to the protection of health, safety and the environment, human rights and also on the assessment of their compliance with the principles enshrined in this Code of Ethics and those relating to the fight of corruption, terrorism, receiving stolen goods, money laundering, forms of illicit intermediation and labor exploitation as well as the application of national and international sanctions and the prohibition of trade in particular categories of products. To this end, the Company has adopted specific internal procedures to manage the compliance of the other parties.

Gifts and donations

The Company prohibits and prevents any initiative not authorized by law or commercial practices. The Company's staff cannot accept in any way goods, gifts, economic offers from suppliers, customers, people and / or commercial organizations and, more generally, from all the subjects with whom it comes into contact during the work, if not of modest value.

It is forbidden to offer any object, service, performance or favor of value to obtain a more favorable treatment regarding any relationship with the Public Administration or with private people.

In those countries where it is customary to offer gifts to clients or others, it is possible to do so when these gifts are of a modest amount, of an appropriate nature and always in compliance with the law. However, this should never be interpreted as a search for favors.

The Company has implemented a special gift register (available on sharepoint at: "https://ballestra.sharepoint.com/sites/GroupLegal/SitePages/ Gift-Register-area.aspx") where Employees must record the gifts received and offered to ensure maximum information and transparency in this regard.

Charitable donations on behalf of The Company are authorised only on condition that:

- are not in cash;
- do not compromise the integrity and/or reputation of the Company;
- do not influence the judgment and/or activity of third parties.

Donations must be made in line with the industrial and social mission of the Company, acknowledging the legitimacy of the initiative and its adherence to the approved budget, the recipient, the purpose, the methods of control of the payment methods.
The Company has adopted a specific procedure for donations and sponsorships to which all Addressees must comply.

Conflicts of interests

The Addresees must avoid situations and/or activities that may lead to conflicts of interest with those of the Company or that could interfere with their ability to make impartial decisions, in the protection of the best interests of the same. Conflict of interest means a situation in which a personal interest of an Addressee may influence or appear to interfere with the manner in which the Addressee should perform its functions and/or the legitimate business interests of the Company. It may be a private**,** professional or financial interest of the addressee or a member of his entourage, which could affect his ability to act impartially and objectively in his professional competences.

Within the Company's business, conflict of interest can occur in many situations. By way of example and not limited to, the following sectors are reported: selection of candidates, identification of remuneration policies, selection and management of third parties (suppliers, consultants, agents), relations with public bodies, procurement activities and financial flows, license agreements and collaboration agreements.

Any conflict of interest results in the appearance of inappropriate circumstances that can damage Company's reputation. In general, in order to eliminate or minimize the risk of conflict of interest, the provisions issued in particular on anti-corruption and the regulation of gifts, donations and sponsorships must be respected.

The employee or collaborator involved in a situation that, even potentially, may constitute or determine a conflict of interest, must promptly refrain from intervening in the operational / decision-making processes and must inform his hierarchical manager and / or the Supervisory Body so that it can identify the operational solutions to safeguard independence, transparency and fairness in

carrying out activities.

Protection of personal data (Privacy)

As part of the performance of its activities, the Company collects personal data relating to its persons and third parties, which it undertakes to process in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties, as required by the laws and regulations in force. The processing of personal data must take place in a lawful and correct manner and, in any case, only the personal data necessary for specific, explicit and legitimate purposes are collected and recorded. To this end, the Company adopts and implements organizational and technical measures that ensure the confidentiality and security of personal data and compliance with applicable legal and regulatory requirements regarding privacy**.** In compliance with the legislation to protect privacy, the Addressees must undertake to protect the information generated or acquired and to avoid any improper or unauthorized use.

CRITERIA FOR CONDUCTING RELATIONS WITH STAKEHOLDERS

In line with its commitment to the issues of social responsibility, the Company is sensitive and open to the requests of external parties with whom it has relations, in particular to the legitimate interests of the Stakeholders with whom it interacts and, towards whom specific modes of conduct are reported.

Customer Relations

Customer satisfaction

The Company recognizes that the approval of the Customers is fundamental to its business success and aims its commercial policies to ensure the quality of the goods and services offered.

Each Addressee, as part of the management of relations with Customers and in compliance with internal procedures, must promote maximum customer satisfaction by providing, among other things, exhaustive and accurate information on the products and services offered, in order to encourage informed choices.

Addressees must therefore operate in compliance with the project objectives and contractual clauses, periodically verifying with the customer the achievement and operating with a strong sense of collaboration. In carrying out operational activities, the Company makes available to Customers professionals who have the skills and experience to meet their requirements and refrains from accepting assignments for which it would not be able to ensure the necessary suitability.

Rules of commercial fairness

Any commercial relationship with public or private bodies must first of all be based on respect for the law and on the principles of loyalty and fairness. Therefore, during a business negotiation, request or commercial relationship with the Public Administration or with private subjects, the following actions should not be taken, directly or indirectly:

- examine or propose employment and/or commercial opportunities that may be of personal benefit to the employees of the Public Administration or the employees of private parties;
- offer or in any way provide gifts, unless of modest value or within the scope of applicable uses;
- tolerate that the other party adopts behaviors detrimental to human rights, or seriously impacting the environment and / or the social fabric of local communities;
- solicit or obtain confidential information that may compromise the integrity or reputation of either party.

Addressees must not promise or offer illicit payments or goods to promote or favor the interests of the Company. Therefore, any corruption or bribery that could damage in any way the image or reputation of the Company and its relations with Customers is not acceptable.

Relations with Shareholders

The administrative body and the company's management undertake to safeguard the corporate assets of its shareholders, using sound and prudent management criteria and guaranteeing reliable and continuous information flows to them.

Relations with Employees and Collaborators

The Company considers its own Staff as a patrimony that must be valued and protected, and is therefore particularly attentive to the motivation of Staff towards which relations based on correctness and clarity are established.

Transparent policies in employment relations

The Company defines recruitment policies and conduct selection activity on the basis of actual professional competence, in line with the required profiles, without implementing any type of discrimination on grounds of nationality, religious belief, political and trade union membership, language, gender and sexual orientation. The Company also undertakes to avoid favouritism, nepotism or facilitation both in the selection and recruitment phase and in the management and growth phase of personnel.

The Company establishes relations with its Employees and Collaborators according to the principles of transparency and legality, also guaranteeing economic treatment based on the principles of fairness and meritocracy. The Company does not adopt any form of irregular work and is committed to respecting fundamental human rights, preventing child exploitation and all forms of slavery. Employment contracts are oriented to full compliance with current legislation on immigration and employment.

In particular, all Addressees must pay attention to the regularity of the origin of third-country nationals both for direct employment, also through assignments temporarily assigned, and indirectly in the use of third-party suppliers who, for the performance of services they have been assigned to, should make use of irregular personnel.

When the employment relationship is established, the Company shall provide each employee with precise information relating to national collective agreements, where applicable, regulatory aspects,

company rules and regulations. All Employees and Collaborators are also informed about the procedures adopted in the company regarding confidentiality, health and safety in the workplace and the various management systems in place.

Health and safety

The Company guarantees healthy and safe workplaces, in compliance with the regulations in force, and implements adequate periodic training on the subject, addressed to all workers and oriented to the prevention of accidents and injuries.

In particular, Employees and Addressees, within their potential areas of responsibility, are required to:

a) observe the provisions and instructions given by the employer, the HSE managers, t employees in charge and supervisors of the Companies, pursuant to Legislative Decree No 81/08, for the purposes of collective and individual protection;

(b) properly use any machinery, means of transport and other work equipment, safety devices and personal protection equipment;

c) immediately report to the employer, the HSE manager or employees in charge the deficiencies of the means and devices referred to above, as well as any other dangerous conditions of which they become aware, working directly, in case of urgency, within the scope of their competences and possibilities, to eliminate or reduce such deficiencies or dangers, giving notice to the workers' safety representative (RLS).

Confidentiality of information

Employees and Collaborators must know and apply the rules prepared by the Company to guarantee the security, integrity, confidentiality and availability of information.

Each employee and collaborator must refrain from disclosing data or information that comes into possession during the performance of his work activities and in case of doubt about the nature and degree of confidentiality of a certain information must ask his superior. He must also implement all the necessary measures to protect the data present in the company whether on electronic devices or paper copies.

Protection of company assets and respect for the working environment

Each Employee and Collaborator is directly and personally responsible for the protection and conservation of assets, physical and intangible, and resources, whether human, tangible or intangible, which have been entrusted to them to carry out their duties. They should also use these resources properly, consistent with company interests, and in compliance with Italian legislation and other countries in which the Company operates, as well as the social interest of the same.

In particular, each Employee and Collaborator must behave in a way that does not harm the Company's intellectual property rights in any way, whether it is intellectual property registered through trademarks and/or patents or unregistered intellectual property/know-how.

None of the assets and resources owned by the Company must be used for purposes other than those indicated and must be used wisely avoiding waste of resources, both in the workplace and during trips

or missions abroad.

Employees and Collaborators are required to safeguard the workplaces (furniture, common areas, etc.) and to protect their healthiness in respect of the people who work there, they must also contribute personally to promote and maintain a climate of mutual respect in the work environment with the aim of paying attention to the conditions of respect for the feelings of others.

It will be considered conscious assumption of the risk of compromising these environmental characteristics, being or being under the influence of alcohol, drugs or substances of similar effect, during work and in the workplace in Italy and abroad.

Use of IT devices and tools

The e-mail and Internet systems are made available by the Company for purposes related to the exercise of the specific work activity in accordance with current legislation (including legislation on the protection of personal data) and company policies, with the exclusion of the use of the same for illegal purposes. Internet access must be provided in accordance with decorum, legality and company procedures.

The Internet connection or the Company's computers must not be used to consult, transmit or download inappropriate and non-work-related content with particular regard to the consultation of pornographic and child pornography sites.

It is not permitted to use the equipment and IT support of the Company to:

- "enter" illegally into the computer systems of the State, public entities and in any case of third parties, hold and disseminate access codes;
- interrupt its operations and related communication activities;
- damage the information, data and computer programs of others;
- produce false public digital documents.

Furthermore, Employees and Collaborators are required not to install software products on the IT devices made available by the Company in violation of the contractual agreements of license of use and, in general, of all laws and regulations governing and protecting copyright.

They are also required to comply with the other rules of conduct and operation established by the specific documents of the IT management system.

Relations with Suppliers

The Company selects with particular attention the Suppliers in compliance with the principles of equal opportunities, transparency, impartiality, fairness and sustainability in the broadest sense, ascertaining the actual technical and professional competence and the appropriate means / tools to deal with the commissioned activity.

The selection of suppliers and the determination of purchasing conditions must be carried out, whenever possible, in a competitive context and in any case on the basis of an objective and transparent assessment that takes into account, inter alia, the price, the ability to provide and guarantee services of adequate quality and, also, the integrity, professionalism and reliability of the supplier.

The conclusion of contracts with Suppliers must be in writing. The contract must indicate the type of goods or services supplied, the related expense, in line with market rules and fair competition, with the principles of this Code of Ethics and with the company policies and procedures defined in this

regard.

In particular, all Addressees must pay attention to anti-money laundering issues, both by verifying in advance the information available on Suppliers in order to ascertain their respectability and the legitimacy of their activity, and by operating in such a way as to avoid any involvement in operations suitable to promote money laundering from illegal or criminal activities.

In any case, all Suppliers are required to comply with the rules of conduct provided for Employees and Collaborators applicable to them, in particular with regard to health and safety in the workplace, the confidentiality of information, the protection of company assets and respect for the work environment.

Relations with Public Administration and Public Institutions

The Company condemns any behavior, by anyone put in place, consisting in promising or offering, directly or indirectly, money or other benefits to Public Officials and / or Public Service Representatives, as well as in improperly influencing the decisions of the aforementioned.

Therefore, the Addressees must not promise or offer to Public Officials or employees in general of the Public Administration or Public Institutions payments or goods to promote or favor the interests of the Company.

Addressees who, as part of their functions, are legitimately in contact with the Public Administration and Public Institutions are responsible for verifying, in advance and with due diligence, that what has been declared and/or attestedin the interest of the Company is true and correct.

Relations with political and trade union organizations

In principle, the Company does not make contributions to political and trade union parties, committees and organisations. If necessary, these disbursements will be made in accordance with the laws in force and must be properly registered.

The Company undertakes to maintain positive and constructive relations with the trade union representatives regularly elected.

The Addressees acknowledge that any form of involvement in political activities takes place on a personal basis, in their free time, at their own expense and in accordance with the laws in force.

THIRD SECTION

CURCULATION AND TRAINING

Circulation to Addressees

The publication of the Code of Ethics is in paper form and in electronic format. The Company is committed to disseminating the principles and values it considers essential for the management of its activities.

The punctual internal and external dissemination of the Code of Ethics is guaranteed by:

- the posting in a place accessible to all Employees and Collaborators;
- publication on the company intranet and on the website.

Training

The Company, also through the collaboration of the Supervisory Body, prepares and executes training initiatives on the principles of this Code and on related matters.

COMMITMENT TO THE CODE

Employees will be required to formalize acknowledgment and commitment to comply with the Code of Ethics. Contracts with Suppliers also provide for both the commitment to comply with this Code of Ethics and contractual sanctions for the event of violation of this commitment.

BREACHES OF THE CODE

Any breach of the provisions of this Code damages the relationship of trust established with the Company and may lead to disciplinary, legal or criminal actions.

No unlawful behavior or behavior that does not comply with this Code of Ethics will be justified or considered less serious because it is carried out in the interest or for the benefit of the Company.

Any breach of the provisions of this Code of Ethics entails the application of the sanctioning measures indicated by applicable laws and company regulations

The penalties imposed will be proportionate to the seriousness of the infringements.

Consequences of breaching the Code of Ethics for Employees

Failure to comply with and/or violate the rules of conduct imposed by the Code of Ethics by employees of the Company constitutes a breach of the obligations arising from the employment relationship and represents a disciplinary offence.

With reference to the sanctions that can be imposed, it should be noted that they will be applied in compliance with the provisions of the CCNL procedures.

The ascertainment of the aforementioned breaches, the management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the company functions in charge and delegated to this. The sanctions that can be imposed will be applied in compliance with the applicable legislative and regulatory provisions (also in accordance with the provisions of the National collective bargaining agreement where existing).

Consequences of breaching the Code of Ethics for Directors, Statutory Auditors and members of the Supervisory Board (SB)

In the event of a breach of the Code of Ethics by the Directors, Auditors and members of the SB of the Company, the competent corporate bodies shall take the most appropriate protective measures from time to time within the framework of the applicable legislation

Consequences of breaching the Code of Ethics for Collaborators and Suppliers

Any conduct that maybe carried out by Collaborators or Suppliers, in violation of the provisions of the Code of Ethics, may determine, in accordance with the provisions of the contractual provisions, or even in their absence, the termination of the contractual relationship, without prejudice to the further request for compensation if such behavior causes damage to the Company, even independently of the termination of the contractual relationship.

REPORTING A BREACH OF THE CODE OF ETHICS

All Addressees are required to know the principles and contents of the Code of Ethics as well as the relevant procedures governing the functions and responsibilities covered. All information relating to possible breaches of the Code of Ethics must be immediately reported to the Supervisory Body and, in the case of Employees, if deemed appropriate, to their line manager as well.

The Supervisory Body acts, in such cases, in compliance with the rules contained in the General Part of the Model and in the internal procedure for reporting breaches. The Supervisory Body, in particular, receives the reports guaranteeing the absolute confidentiality of the identity of the whistleblowers, without prejudice to legal obligations, protecting the aforementioned from any form of retaliation or prejudicial effect.

Reports made in writing can be sent by communication to the e-mail address "organismodivigilanza@ballestra.com"or, by sending the reports to the following address: Ballestra spa – Supervisory Body, Via P. Portaluppi 17, 20138, Milan, or through the specific box at the entrance of each italian local units.

GLOSSARY

In this Code of Ethics the following definitions apply:

Company	The Company in its operational, organizational and decision-making aspects.
Shareholders	Holders of shares in the Company.
CCNL	The National Collective Labour Agreement applicable to the Company's employees, pro tempore in force.
Customers	Subjects who establish a contractual relationship concerning the design and supply by the Companies of industrial machines and plants, spare parts, engineering services, technical assistance.
Collaborator	The person who collaborates in the activities of the Company without belonging to them, in the absence of an employment contract.

Compliance	Compliance with national and international regulations relating to international sanctions, embargoes, anti-corruption, privacy, export control, etc.
Conflict of interest	A conflict of interest occurs when decision-making responsibility is entrusted to a person who has economic, personal or professional interests that conflict with the impartiality necessary to hold that responsibility. Impartiality in decision-making may not be guaranteed due to a possible prevalence or influence of such interests.
Legislative Decree 231/01 (Decree 231 or Decree)	Legislative Decree no. 231 of 8 June 2001 and subsequent amendments and additions.
Addressees	The Board of Directors, Board of Statutory Auditors, Supervisory Body and Independent Auditors, all employees of the Companies and all those who, directly or indirectly, permanently or temporarily, establish relationships and relations there or work on behalf of or in the interest of the Companies.
Employees	Staff with permanent employment contracts, workers with fixed-term employment contracts similar to employees.
Direction	Executive Committee
Suppliers	Suppliers, partners, outsourcers, consultants and agents.
Public service representatives	Persons who, in whatever capacity, provide a public service. A public service must be understood as an activity regulated in the same forms as the public function, but characterized by the lack of powers typical of the latter, and with the exclusion of the performance of simple tasks of order and the provision of purely material work.
Management	Managers and function managers.
Model, MOG-231	The Organization and Management Model in its entirety (General Part, Special Parts, Protocols issued or implemented for the purposes of Legislative Decree 231/2001).
Supervisory Body (SB)	Supervisory Body of Ballestra appointed pursuant to Decree 231.
Staff	All natural persons who have an employment relationship with the Company, including employees, temporary workers, collaborators, "interns" and freelancers who have received an assignment from the Company.
Public Institutions	Institutional bodies of a State and its local authorities.
Public official	A public official "for the purposes of criminal law" is one who exercises "a legislative, judicial or administrative public function",

	moreover "the administrative function governed by rules of public law and authoritative acts and characterized by the formation and manifestation of the will of the public administration or by its development by means of authoritative or certifying powers is public".
Sustainability	In terms of the economy and the market, a condition for development capable of ensuring the satisfaction of the needs of the present generation without compromising the ability of future generations to fulfil their own needs. Ballestra is inspired in this field by the principles of the International Standard ISO 26000.
Stakeholders	Allthe stakeholders of the Company, such as: Customers, Shareholders, Employees and Collaborators, Public Administration and public institutions, Suppliers, political and trade union organizations.
Legal Department	Responsible for Ballestra's Legal Department .