

Code of ethics



2023 Edition

Foreword



The 2023 edition of the Code of Ethics formalizes those behavioral principles and values that, analogously with regulatory principles, distinguish the businesses and the organization of SACMI Imola S.C. and other companies in the Group.

Approved by the Boards of Directors of the Group companies, the Code of Ethics is binding for corporate bodies, management, employees, external partners, suppliers and all those having relations with the Group (hereinafter also referred to as 'Recipients').

CODE OF ETHICS OF IPREL PROGETTI (Hereinafter “the Code of Ethics”)



This Code of Ethics was approved by the Board of Directors of IPREL PROGETTI (Hereinafter “the COMPANY”), by resolution of 03-08-2023.

The Code of Ethics represents the formalization of the essential core of principles and values, already entrenched in Sacmi Group corporate culture, which the COMPANY and the other Group companies are complying and must continue to comply in their internal and external activities.

This Code of Ethics is communicated to all Boards of Directors of Sacmi Group Companies, Italian and foreigners, so each Group Company could consider the opportunity of its adoption, while respecting the legal autonomy of each company and taking into consideration the different legal and socio-cultural contexts in which they operate.

In any case, to each of the Group Companies is request to communicate to SACMI IMOLA S.C. the Code of Ethics adopted, as well as any review and / or update and / or change.

If the Group companies decide to adopt the Code of Ethics, they have to send to SACMI IMOLA S.C. the copy of the resolution of the Board of Directors.

In the Group Companies in which the Code of Ethics is adopted, all the company bodies, the management and the employees have to respect it.

Within business relations with partners / external consultants, suppliers, customers and anybody, for any reason, will engage with the Sacmi Group companies, will be given preference to those who intend to comply with these principles, and will not be initiated or continued relationships with those who do not respect them or do not want to respect them.

The Code of Ethics must be made known by any means (including e-mail and published on the Intranet / Internet business sites) to all stakeholders, who must commit to observe it.

Summary



- 1** Compliance with laws and regulations.
- 2** Corporate management and accounting
- 3** Business management
- 4** Relations with public administration
- 5** Relations with politics
- 6** Human resources and workplace safety.
- 7** Sfeeguarding the environment.
- 8** Confidentiality
- 9** Privacy.
- 10** Models and procedures

1 Compliance with laws and regulations



The COMPANY:

- acts in full compliance with the law, the Articles of Association and the regulations in force
- may not pursue their interests in violation of the law
- fully cooperates with public bodies in matters concerning the legally required transmission of data and/or information or any legitimate requests for such data/information from authorities.



The COMPANY ensures:

- proper functioning and oversight of Corporate Bodies
- protection of Shareholders' property and participatory rights
- proper corporate accounting practices and compliance with the principles of truthfulness and fairness in drafting any legally significant document containing economic, equity or financial data.

Their procedures are, particularly in capital or finance-related operations, structured to ensure the separation of responsibilities, thus allowing each accounting operation to be satisfactorily prepared, authorized and logged.

3 Business management



The COMPANY competes fairly on markets in compliance with rules on competition. Therefore:

- no form of gift or other benefits that extend beyond routine business or courtesy practices shall be used to acquire preferential treatment
- situations in which persons involved in transactions have a conflict of interest are to be avoided; if personnel should observe such a situation, they must inform their manager
- fees paid to consultants and partners shall be appropriate and proportionate to the task entrusted to them
- use of cash must be limited and, in any case, remain within the legal limits in force.

4

Relations with public administration



Relations with public bodies may only be maintained by corporate figures formally delegated to do so.

Within such relations:

- promises of any money or any form of reimbursement with a view to obtaining advantages for the Company are not permitted; gifts are allowed only if of modest value and, in any case, in compliance with company procedures
- it is forbidden to make untruthful statements in order to obtain public funds, grants or loans, etc.
- sums received from national or EU public bodies by way of disbursements, contributions or loans etc. shall not be used for purposes other than those for which they were allocated.

5 Relations with politics



Any persons required to comply with this Code of Ethics who take part in politics do so on an exclusively personal basis.

The COMPANY does not on principle, make donations to political parties, committees, organizations or candidates.



The COMPANY sees employees as vital to success, hence its sharp focus on the health, safety and training of human resources.

For this reason, the COMPANY undertakes to:

- comply with all regulations concerning work, social security, welfare, safety, accident prevention and hygiene regulations in the workplace
- ensure the physical and moral integrity of its personnel, equal rights and opportunities, and safe, healthy, dignified working conditions for all workers
- oppose any behavior or attitudes that are discriminatory or harmful to individuals, their beliefs or preferences
- prevent any abuse of power within hierarchical management frameworks to ensure relations are conducted fairly and honestly at all times.

Personnel are selected in full compliance with current legislation. The Company is an equal opportunities employer. All candidates undergo verification to ensure their qualifications match the required professional profiles.

The Company adopts measures to prevent nepotism, favoritism or forms of influence peddling during selection and recruitment.

7

Safeguarding the environment



The COMPANY is aware that its work can impact the areas where it does business and therefore undertakes to comply with environmental standards and fulfill the relevant legal obligations.

The COMPANY has dedicated members of personnel with the technical skills and powers needed to verify, assess, manage and control environmental risks.

8 Confidentiality



Recipients of the Code of Ethics are required to treat any news, data or information of a private, secret or confidential nature with the utmost discretion and shall only process it for the purpose of performing their assigned professional tasks.



The privacy of Company, Employees and Partners shall be safeguarded as per the regulations in force and no personal data shall be transmitted or disseminated - without prejudice to obligations imposed by law - without the prior consent of the interested parties.

10 Models and procedures



The Company ensures dissemination and observance of the rules of conduct and the procedures that safeguard the principles and values set out in this Code of Ethics; moreover, in order to prevent crimes pertinent to Italian Legislative Decree 231/2001 concerning the administrative liability of legal entities, it adopts suitable organizational, management and control models.



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