

ATI S.p.A. - Injection applications and technologies

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CODE OF ETHICS OF ATI S.p.A.

This Code of Ethics has been drawn up by the Company Management and adopted by A.T.I. S.p.A. starting at 01 October 2020.

The Code of Ethics, also defined to meet the requirements of Legislative Decree 231/01, contains principles and rules of conduct to be adopted in the company decision-making processes.

The Code expresses the ethical commitments and responsibilities in the conduct of business and company activities to which each Recipient must comply in the performance of his or her work.

RULES OF CONDUCT AND RELATIONS WITH EMPLOYEES

A.T.I. S.p.A. recognises the value of human resources, through the protection of their physical and moral integrity, favouring a continuous increase in technical and professional skills in a positive and stimulating work environment. A.T.I. S.p.A. undertakes to promote a working environment in which are guaranteed:

- Respect for Human Rights;
- Safeguarding safety, health and integrity;
- Prevention of all types of discrimination;
- Equal opportunities and meritocracy.

RESPECT FOR HUMAN RIGHTS

A.T.I. S.p.A. recognises the importance of maintaining and promoting Human Rights and respecting workers' rights throughout the entire value chain. A.T.I. S.p.A. rejects forced and child labour and any type of physical, verbal, sexual or psychological harassment, abuse, threats or intimidation in the workplace, thus guaranteeing respectful and favourable working conditions in the countries in which it operates, also in terms of working hours and determination of wages.

It is required to:

- ensure a job free from discrimination and harassment;
- not knowingly maintain, either directly or indirectly, relations of any kind with persons who violate in any way the rules on the protection of child labour and the protection of women and/or the illegal use of work deriving from immigration trafficking;
- prohibit any form of intimidation, threat, harassment or abuse in any form, whether physical or verbal, that creates an intimidating, offensive and hostile work environment (sexual harassment, offensive language or attitudes, racial, ethnic, sexual or religious insults);
- recognise the right of employees to free association and collective bargaining.

SAFEGUARDING SAFETY, HEALTH AND INTEGRITY

A.T.I. S.p.A. acts in full compliance with the health and safety regulations applicable in the various countries in which it operates. A.T.I. S.p.A. is committed to safeguarding the health and safety of employees, suppliers, customers, visitors, consultants and anyone who comes within the sphere of influence of A.T.I. S.p.A. in each of the countries in which it operates, from production facilities to offices and points of sale.

Safety is everyone's responsibility. Employees receive appropriate training on health and safety standards. A.T.I. S.p.A. supports the development of the skills necessary for the performance of work activities, providing training programs and education useful for promoting safe behaviours. It is important that everyone is called upon to comply with existing health and safety rules and to adopt appropriate preventive measures in order to protect themselves and others.

A.T.I. S.p.A. is attentive to health in all its meanings and is committed to evaluating and preventing work-related stress and promoting training initiatives on wellness issues.

These commitments are detailed in the Policy for the Management of the Workers' Health and Safety.

It is required to:

- adopt all the preventive measures necessary to avoid endangering the safety of oneself or other people and to be proactive, reporting any behaviour, dangerous working conditions, critical issues or concerns when a task is considered dangerous or when one does not have the adequate preparation for its performance;
- adopt a preventive approach that provides adequate protective devices and a scrupulous audit and risk assessment activity with consequent implementation of improvement plans;
- be an example and promoter of the culture of prevention;
- achieve regular maintenance of workplaces, equipment, installations and safety and security devices, as well as the adoption of innovative technologies and systems to operate safely;
- avoid any form of aggression, whether physical or verbal;
- not to abuse alcoholic beverages and/or use narcotic substances or any other substance that may prevent the performance of work effectively and expose themselves and others to a safety risk;
- define and adopt health and safety behaviours and standards, also by the suppliers, aligned with the Health and Safety Management Policy.

PREVENTION OF ALL FORMS OF DISCRIMINATION

A.T.I. S.p.A. undertakes to prevent and avoid any form of direct and indirect discrimination based on age, sex, gender, skin colour, sexual orientation, marital status, religious belief, language, ethnic or national affiliation, state of health and various physical or mental abilities, state of pregnancy, maternity or paternity, including adoptive parents, beliefs and personal opinions, political opinions, affiliation or trade union activity and any other form of diversity. A.T.I. S.p.A. also aims to create an inclusive work environment capable of accepting differences and enhancing them in the belief that diversity constitutes a wealth for the development of the entire company and for better meeting the challenges of the market.

It is required to:

- take any decision relating to recruitment, promotions, transfers, disciplinary measures, taking care to avoid any kind of discrimination while respecting diversity;
- act with diligence, accuracy, impartiality and honesty, avoiding any discrimination not only in the performance of their duties but also in intra-corporate relations and, more generally, with all stakeholders;
- not tolerate harassment, abuse, racism and discrimination of any kind;
- avoid any behaviour that could harm personal dignity;
- not carry out acts of propaganda, instigation and incitement to hatred or violence on racial, ethnic, national or religious grounds.

EQUAL OPPORTUNITIES AND MERITOCRACY

A.T.I. S.p.A. values the principle of equal opportunities in all aspects of the employment relationship (recruitment, training, allocation of benefits, career advancement, disciplinary proceedings, interruption of the employment relationship, retirement), without distinction on the basis of ethnic origin, sex, skin colour, gender, sexual orientation, religion, nationality, age, political opinion, trade union affiliation, marital status, different physical or mental ability or any other status or personal characteristic.

With a view to enhancing and developing people, A.T.I. S.p.A. applies a performance evaluation system that measures the skills put in place to achieve the assigned objectives, from a meritocratic perspective.

It is required to:

- support equal opportunities for each employee;
- offer a fair level of remuneration and a path of professional development and growth that reflects the knowledge, skills, abilities and professional experience of each individual, avoiding favouritism.

PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

A.T.I. S.p.A. acts in full compliance with the industrial and intellectual property rights legitimately held by the Company itself and third parties, as well as with laws, regulations and agreements, including in the European community and/or international context, to protect these rights. Intellectual property, patents, trademarks, logos, copyrighted materials, inventions, trade secrets and other confidential internal information – including business plans and strategic projects, marketing, pricing and sales data, business and organisational details – together they constitute an asset of extreme value upon which the competitive strength of A.T.I. is based. S.p.A. The company also encourages and promotes innovation and technological evolution of the product and the processes carried out by its Employees and by third parties who lend their activities to the Company.

It is required to:

- Sign the "Confidentiality Agreement for employees" at the time of hiring;
- refrain from any conduct that may constitute usurpation of industrial property rights, alteration or counterfeiting of distinctive signs of industrial products, or of patents, designs or industrial models, both domestic and foreign, or infringement of intellectual works protected by copyright;
- refrain from importing, marketing or however using or otherwise putting into circulation industrial products with counterfeit, false or altered distinctive signs or made by usurping the rights of third parties;
- not to allow third parties to use the trademarks or intellectual property of A.T.I. S.p.A. without the necessary authorisation and without an approved licensing agreement;
- not allow third parties to use proprietary material and logoed material in an unauthorised or improper manner;
- endeavour to safeguard intellectual property with the utmost care, disclosing it only if strictly necessary and with prior authorisation, within the framework of confidentiality agreements.

PROTECTION OF CONFIDENTIAL INFORMATION AND PRIVACY

A.T.I. S.p.A. undertakes to protect any sensitive, reserved or confidential information concerning the company, employees, suppliers, customers and collaborators. By way of example and not all-encompassing, the following are considered confidential information: company projects (commercial, strategic, industrial, operational, drawings, etc.), prices, investments and divestments, data relating to Employees, information concerning know-how and processes, databases such as Suppliers, Customers and Collaborators, technological innovation activities, acquisition or merger plans and corporate agreements, in general the economic and financial information concerning the company.

As part of the performance of the activity, A.T.I. S.p.A. collects a significant amount of confidential information and personal data, which it undertakes to process in compliance with all the laws in force and the best practices applied in this regard.

A.T.I. S.p.A. protects personal data processed in the context of its business activity in order to prevent improper or even unlawful use, and consequently adopts specific technical measures to ensure their protection from any form of violation and/or abuse, as well as procedures aimed at providing adequate information to the interested parties.

A.T.I. S.p.A., in compliance with the subjective right to the protection of the personal data of the interested parties, whether they are Employees, Collaborators, Customers, Suppliers, Contractors, Consultants, Partners, provides them with complete and updated information on the processing of data, including sensitive data, acquired by A.T.I. S.p.A. itself or that will be acquired and/or processed during the course of the activity. The Company shall request the informed consent of the interested parties whenever it is necessary exclusively for the purposes for which the data processing is intended.

A.T.I. S.p.A. also strives to ensure an increasingly high level of security in the selection and use of its information technology systems for the processing of personal data and confidential information.

It is required to:

- Sign the "Confidentiality Agreement for employees" and the "Authorisation to process data under the direct authority of the data controller" at the time of hiring
- keep strictly confidential and the exclusive property of A.T.I. S.p.A. any information, data or news of which the Recipients become aware or in possession in relation to their employment or professional relationship, to protect the company's assets. Such information may concern present and future activities, information and news not yet disseminated, even if it is about to be disclosed and, as such, is potentially price sensitive;
- comply with the laws, regulations and company procedures regarding any external communication of documents and information concerning A.T.I. S.p.A. In any case, the following is forbidden:
 - the disclosure of any "price sensitive" information acquired in the performance of business, professional or office activities;
 - the disclosure of false or biased news concerning A.T.I. S.p.A. or other entities with which the company relates while carrying out its activities;
 - the use of confidential information relating to A.T.I. S.p.A. for carrying out or suggesting transactions on financial instruments.
- reserve exclusively the reports to the functions in charge of A.T.I. S.p.A. with the mass media, in order to ensure completeness and consistency of the information;
- not disclose reserved and confidential information even after the termination of the company office or the termination of the employment and/or collaboration relationship;
- it is required to store the data in such a way as to prevent third parties from becoming aware of it;
- communicate and disclose the data in the context of the procedures established by A.T.I. S.p.A. or with the prior authorisation of the person delegated to do so;
- use the personal data correctly and for a specific, clear and legitimate purpose and only keep them as long as they are necessary for the purpose for which they were collected.

SAFEGUARDING COMPETITION AND RELATIONS WITH THE AUTHORITIES

A.T.I. S.p.A. acts in full compliance with national and European Community antitrust legislation, as well as with similar non-EU legislation, to safeguard competition and the free market, and collaborates with the competition authorities. A.T.I. S.p.A. does not deny, hide or delay any information requested by the authorities for the safeguarding of competition in their inspection functions, actively collaborating during any investigation procedures.

It is required to:

- Avoid that through their behaviours (acts or omissions) there could derive alterations of free competition in contrast with national and European Community antitrust law and similar non-EU regulations;
- promptly inform the Company Management if they become aware of potential antitrust violations by the Company or its competitors;
- not to ignore the antitrust legislation, considering that this is in the interest of A.T.I. S.p.A. No one within the Company is entitled to give orders or directives that are contrary to such legislation.

ADMINISTRATIVE MANAGEMENT AND FINANCIAL STATEMENT

A.T.I. S.p.A., in the preparation of the Financial Statement and any other type of accounting documentation, respects the applicable laws and regulations in force, adopts the generally accepted accounting practices and principles and is inspired by the principle of transparency of relations with stakeholders, faithfully representing the management facts, according to criteria of clarity, truthfulness and correctness in compliance with internal procedures. A.T.I. S.p.A. undertakes to communicate the company information externally exclusively through the functions assigned to it and in accordance with the company procedures in force aimed at ensuring its truthfulness and correct dissemination.

A.T.I. S.p.A., moreover, has adopted administrative and accounting procedures aligned with these principles. All operations of a financial nature, as well as all movements of money into and out of the Company, are carried out by persons with the relevant powers, subject to authorisation, and are always justified, traced and recorded.

It is required to:

- be responsible for compliance with company operating procedures, the authenticity and truthfulness of the documentation and information provided in the performance of their business activity;
- collaborate so that the facts of management are correctly and promptly reflected in the financial statements, reports or other corporate communications required by law, directed to shareholders or the public and the auditing firm;
- make the supporting documentation easily available and archive it according to appropriate criteria that allow easy consultation, also by internal and external bodies authorised to control it;
- keep accurate and complete company accounts, avoiding:
 - falsifying, omitting, incorrectly declaring, altering or concealing any information;
 - encourage or allow any other person to compromise the accuracy and integrity of the keeping of accounts.
- comply with archive management policies for all documents, files, electronic documents and e-mails.

RELATIONS WITH SUPPLIERS

A.T.I. S.p.A. considers its Suppliers as partners. For this reason, anyone is required to interact with them, always demonstrating the utmost correctness and professionalism, encouraging continuous collaborations and mutual growth, building solid and lasting relationships of trust in compliance with laws and regulations.

A.T.I. S.p.A. in the selection of Suppliers and in the formulation of the conditions of purchase of goods and services, is inspired by the principles of objectivity, competence, economy, transparency, fairness, quality of the good or service and compliance with the related internal procedures, accurately evaluating the guarantees of assistance and the panorama of offers in general. In particular, it undertakes to seek from Suppliers and external collaborators professionalism and full sharing of the principles and contents of the Code of Ethics and the Code of Conduct of Suppliers adopted by A.T.I. S.p.A. and promotes the construction of lasting relationships for the progressive improvement of performance in the protection and promotion of the principles and contents of the Code.

The purchasing processes, in A.T.I. S.p.A., are based on compliance with the principles and laws to safeguard competition, ensuring maximum transparency and efficiency of the process itself. They must also be based on the search for maximum competitive advantage for the company and on fairness and impartiality towards any supplier in possession of the necessary requirements.

A.T.I. S.p.A. guarantees the professionalism, integrity and legitimacy of the relationships, avoiding the stipulation or continuation of the relationship with Suppliers suspected of belonging and facilitating criminal organisations or that behave in a manner that does not comply with the applicable rules and the established and shared principles.

All Suppliers must carefully read and adhere to the entire contractual documentation submitted by A.T.I. S.p.A. and the rules of conduct prepared and communicated, the violation of which – qualified as a serious breach – could be cause to apply a clause for the termination of the contract.

It is required to:

- guarantee maximum correctness and professionalism from the first moments in which the relationship is established, ensuring a selection process of Suppliers, which guarantees everyone equal opportunities to work with A.T.I. S.p.A. The choice of Suppliers must be based exclusively on the technical skills of the partners, their reliability, including financial, the most competitive economic conditions and full adherence to the ethical standards of A.T.I. S.p.A., as well as on parameters of competition, objectivity, correctness, fairness in price, quality of the goods and/or service. In particular, it is necessary to:
 - evaluate a plurality of offers with objective and documentable criteria, ensuring that each operation/transaction is legitimate, authorised, consistent, congruent, documented, recorded and at all times verifiable;
 - assess the quality, convenience, cost-effectiveness and conformity of the offers with the company's needs, in compliance with the principles of correctness and transparency;
 - verify the requirements of professionalism, good repute and reliability of the counterparties;
 - give participants who meet the necessary requirements equal opportunities to participate in the selection process;
 - verify, also through appropriate documentation, that they have the means, including financial, organisational structures, technical skills and experience, quality systems and resources appropriate to the needs and image of A.T.I. S.p.A.
 - ensure the traceability of the choices by keeping the documents that prove compliance with the internal procedures and the purposes of the purchase.
- ban and prosecute corrupt practices, illegitimate favours, collusive behaviour, solicitations
- of benefits, payment of material and intangible benefits as well as other benefits aimed at influencing or compensating representatives of institutions as well as employees of A.T.I. S.p.A.
- avoid the assumption of contractual obligations that involve forms of mutual dependence;
- not accept or solicit any form of personal advantage;
- not offer or accept gifts or other forms of benefits and/or utilities that can be interpreted as a means of obtaining favourable treatment for any activity that can be linked to A.T.I. S.p.A. and are not attributable to normal commercial or courtesy relationships;
- request the same treatment from the Suppliers;
- provide in the contracts with the Suppliers an invitation to read the Code of Ethics;
- inform Suppliers about the principles of the Code of Ethics, with particular reference to the issues of the health and safety of workers, protection of human rights, child labour, protection of the environment, animal welfare, anti-counterfeiting, anti-corruption;
- for the most relevant and strategic supply relationships, periodically verify compliance with the previous point.

CUSTOMER RELATIONS

Customer relations are based on the full satisfaction of their needs with the aim of creating a solid relationship inspired by the general values of correctness, honesty, integrity, professionalism, transparency, legality and impartiality.

It is required to:

- ensure the highest quality standards of the products sold or of the services provided;
- comply with the commitments and obligations undertaken;
- provide accurate, complete and truthful information so as to allow the Customer to make a conscious decision;
- condemn the use of any advertising and/or communication tool in any way, to mislead the Customer about the quantity, quality, origin and provenance of the products/services offered;
- ensure the utmost attention to suggestions and any complaints from Customers;
- ensure that the products meet expectations and comply with market requirements, in accordance with the laws in force in the countries of marketing, including in terms of safety (by way of example, but not all-encompassing: to the safety of the materials and chemical substances used), pursuing quality and continuous improvement in the activities carried out;
- to inspire communications and advertising messages addressed to Customers on the basis of criteria of clarity and transparency, prohibiting the use of any deceptive, elusive or incorrect practice, ensuring that the products and services provided to Customers correspond to the aforementioned commercial standards and communications;
- ensure that communication is defined with extreme care and sensitivity so that it is in line with company values, respects human dignity, is non-discriminatory and does not draw from violent behaviour or dangerous behaviour patterns. Likewise, the content shown in any promotional and advertising activity must not promote aesthetic canons that may lead to behaviours that are detrimental to the well-being and health of the individual.

RELATIONS WITH THE PUBLIC ADMINISTRATION

Public Administration means all those subjects, private and public law entities, Italian or foreign, who perform a "public function" or a "public service". "Public function" means activities, governed by rules of public law, relating to legislative, administrative and judicial functions. "Public service" means the activities of production of goods and services of general interest and subject to the supervision of a Public Authority, and those activities aimed at guaranteeing the rights of the person to life, health, freedom of communication, including under concession and/or agreement.

A.T.I. S.p.A. operates according to principles oriented to maximum transparency, clarity, fairness and impartiality of relationships, in order not to generate partial, distorted, ambiguous or misleading interpretations in public institutional entities, with which it deals with in various capacities. Establishes relations of maximum collaboration with the Public Administration, public officials or persons in charge of a public service, inspiring their conduct to the strictest compliance with the applicable legal and regulatory provisions and protecting their integrity and reputation.

With regard to the relationships of A.T.I. S.p.A. with political parties and their representatives, they are based on the principles of transparency and ethics.

The assumption of commitments and the management of relationships with the aforementioned subjects are reserved exclusively to the corporate functions in charge of this and to the authorised personnel, in compliance with internal procedures.

It is required to:

- refrain from offering, including through a third party, money or other benefits to the public official involved, to his family members or to persons in any way related to him, from seeking or establishing personal relationships of favour, influence, interference and from making benefits and illegal payments with the aim of directly or indirectly conditioning his or her activity (active corruption);
- not to accept the request by a public official to employees and collaborators for money, gifts or services to carry out a planned or facilitated activity or to not carry it out, in the context of their employment (passive bribery);
- not solicit or obtain confidential information that may compromise the integrity or reputation of both parties or that in any case violate equal treatment and public evidence procedures activated by Public Institutions or Public Officials;
- not to use for purposes other than those for which grants, subsidies or financing obtained from the State or other public body have been granted, even of modest value and/or amount;
- avoid any conduct aimed at obtaining from the State or other public body any type of contribution, financing, subsidised loan or other disbursement of the same type by means of altered or falsified declarations and/or documents or by means of omitted information, including those made by means of a computerised or telematic system;
- avoid reticent, obstructive behaviour or omissions towards national and foreign judicial authorities;
- always ensure the traceability and documentability of contacts with the Public Administration.

FIGHTING CORRUPTION

A.T.I. S.p.A. is strongly committed to combating all forms of corruption in all the countries in which it operates. A.T.I. S.p.A. provides specific rules to prevent, identify and manage the risks of corruption through the provisions of this Ethics Policy.

In recent years, the fight against corruption has been extended and intensified, also thanks to changes made to international treaties and national legislation. The new provisions aim at preventing and punishing corruption, both in international professional relations and in private relations, and concern:

- active bribery, in which an undue benefit (money, gifts or services) is offered or promised with the aim of inducing another person to perform or not perform an intended activity, or facilitating it, in the context of their employment;
- passive bribery, in which another person requests or obtains the offer or promise of money, gifts, services or benefits, to carry out or not carry out a planned activity, or to facilitate it, in the context of their employment.

It is required to:

- ensure that there is no use of bribery of public officials in the management of relations with public authorities on issues such as customs practices, taxes, entry visas and authorisations involving the cooperation of agents, local consultants or third party intermediaries;
- not offer or accept, directly or indirectly, from and/or to public officials, representatives or political parties, customers, suppliers, consultants, agents, business partners or any other person or organisation: money, gifts, services, free goods, if not of modest value, and other types of services, while respecting the autonomy of the decision-making processes thereof;
- not incur representation expenses that could give rise to suspicions of irregularities or give the impression of wanting to influence the work of public officials, representatives or political parties, customers, suppliers, consultants, agents, business partners or any other person or organisation;
- avoid obtaining false licenses and authorisations, speeding up the process, and avoiding new store opening checks;
- avoid influencing the result of the audits, ensuring their correct performance and making available the information and documentation required in a complete manner;
- ensure maximum transparency and fairness in the preparation of the appropriate documentation for the request for contributions or public funding and in the management of relations with the officials of the public bodies providing the services;
- prevent the possibility of funds linked to illegal activities being created;
- ensure respect for the autonomy of regulators and public institutions, in the course of managing normal relations with representatives of institutions or political parties.

CONFLICT OF INTEREST

A.T.I. S.p.A., in compliance with the values of honesty and fairness, undertakes to take all necessary measures to prevent and avoid phenomena of conflict of interest.

Every business activity is aimed at satisfying the interests of A.T.I. S.p.A. Therefore, any situations of conflict between the personal interest and that of the company must be avoided, or previously communicated to the Company Management.

By way of example, but not all-encompassing, the following situations could constitute cases of conflict of interest:

- having economic or financial interests, including through family members, with Suppliers, Customers or competitors;
- using one's position in A.T.I. S.p.A., or the information acquired in the usual work activity, for the benefit of oneself or third parties in contrast with the interests of the company;
- performing work of any kind (work services and intellectual services) with customers, suppliers, competitors and/or third parties in contrast with the interests of the company;
- accepting money, gifts or favours, from natural or legal persons who are or intend to enter into business relationships with A.T.I. S.p.A.

It is required to:

- avoid any situation of conflict of interest between personal economic activities and tasks or role held, in implementation of the values of integrity, transparency, legality and impartiality;
- report situations that, even potentially, may constitute or lead to a conflict of interest for yourself or your colleagues.

RESPECT FOR THE ENVIRONMENT

A.T.I. S.p.A. is committed to spreading a culture of respect for the environment by promoting responsible behaviour on the part of all, and contributing to its protection. A.T.I. S.p.A. is in fact aware of the importance of respect for the environment, understood as a common resource to be safeguarded for the benefit of society and future generations with a view to sustainable development.

A.T.I. S.p.A. aims at continuously improving its environmental performance by minimising the impact of its production site and facilities, as well as activities, services, products and logistics.

These commitments are detailed in the Environmental Policy:

It is required to:

- comply with all applicable environmental regulations;
- minimise the environmental impact, combat climate change and preserve the natural heritage and biodiversity, reduce energy and water consumption, the use of raw materials and potentially hazardous substances, waste generation and greenhouse gas emissions, as well as all other pollutants;
- eliminate environmental risks or minimise them by exploiting field knowledge and technical progress;
- adopt a specific plan for the prevention and management of environmental emergencies;
- continuously checking its production processes in order to monitor their performance and environmental impact.

PROHIBITION OF OPERATIONS AIMED AT MONEY LAUNDERING

A.T.I. S.p.A. firmly condemns any action or act carried out by the Recipients in activities involving the receipt, recycling and use of revenues, assets or benefits deriving from criminal activities in any form or manner. A.T.I. S.p.A. undertakes to comply with the applicable legislation on anti-money laundering and the fight against organised crime, both national and international, also ensuring that the operations to which it is a party do not present, even if only potentially, the risk of favouring the receipt or replacement or use of money or assets deriving from criminal activities.

It is required to:

- take particular care, in commercial transactions, in the receipt and use of coins, banknotes, debt securities and securities in general, in order to avoid the danger of placing counterfeit securities on the market;
- verify, in advance, the information available on suppliers, contractors, partners, consultants and main customers, in order to ascertain their integrity from an ethical point of view and the possession of the technical and professional requirements, as well as the legitimacy of their activity, before establishing these business relationships;
- avoid engaging in or pursuing business relationships with counterparties suspected of membership of criminal organisations or the commission of money laundering offences;
- strictly observe the laws, policies and company procedures in any economic transaction, ensuring the full traceability of incoming and outgoing cash flows and the full compliance of these operations with the laws on anti-money laundering, as well as with the procedures on the use of cash and small cash, in compliance with the limits provided for by Legislative Decree 231/2007.

USE OF COMPANY ASSETS

A.T.I. S.p.A. makes available to each employee and collaborator various company assets and equipment, for the performance of his or her tasks. A.T.I. S.p.A. relies on the protection of the same through responsible conduct and in line with the operating procedures prepared for the regulation of the same, avoiding both improper use and use for personal purposes that may damage them.

It is required to:

- avoid using computer systems in violation of the laws in force;
- avoid any form, even attempted, of undue intrusion or damage to company computer systems or those of others;
- comply with the company's procedures and policies on cybersecurity and use the company devices in accordance with the aforementioned procedures and policies;
- be responsible for the safekeeping, protection and conservation of the physical and intangible assets and resources entrusted to carry out their tasks, as well as for the use of the same in their own way and in accordance with the company interest;
- avoid using, for personal interest of any kind, company assets, such as premises and equipment.

IMPROVEMENO OF THE CODE OF ETHICS

This Code of Ethics and any future updates thereof will be approved by the Board of Directors of A.T.I. S.p.A. Any further specific rules of conduct and policies arising from local practices or regulations may be adopted in addition to this Code of Ethics.

TOOLS FOR KNOWING THE CODE OF ETHICS

The principles, values and rules of conduct present in the Code of Ethics are disseminated within A.T.I. S.p.A. and to third parties. The Code of Ethics is available and accessible to all employees, to the persons who collaborate with A.T.I. S.p.A. and its stakeholders, on the website and on the company intranet.

The adoption of the Code of Ethics is also made known to external persons who collaborate with A.T.I. S.p.A. (external collaborators, consultants, customers, suppliers, etc.) also through the use of specific contractual clauses.

A.T.I. S.p.A. promotes the implementation of training courses for its employees aimed at promoting the full understanding of the principles and standards provided for by this Code of Ethics.

CONSEQUENCES FOR THOSE WHO DO NOT COMPLY WITH THE CODE OF ETHICS

Failure to comply with the rules of conduct contained in the Code of Ethics constitutes a violation of the same and represents a serious breach of contract.

Failure to comply with the principles of the Code of Ethics may therefore result, depending on the case, in the application of disciplinary measures and/or sanctions or the termination of the existing employment or commercial contract.

In particular:

- for Employees and Collaborators of A.T.I. S.p.A., the violation constitutes a breach of the obligations deriving from the employment relationship and/or disciplinary offence that may affect the continuity of the employment relationship and also entail actions for compensation for damages;
- for temporary agency workers who are required to comply with its precepts, violations are sanctioned with disciplinary measures taken against them by the respective labour administration companies;
- for the Directors and Statutory Auditors, the violation of the provisions of the Code may involve the adoption, respectively by the Board of Directors and the Board of Statutory Auditors, of proportionate measures in relation to the seriousness or recurrence or degree of fault, until the revocation of the mandate for just cause to be proposed to the Shareholders' Meeting;
- for Non-employee Recipients, compliance with the Code is a prerequisite for the continuation of the existing professional/collaborative relationship; therefore, the violation of the rules of the Code may constitute a breach of contractual obligations, with all the legal consequences, also in relation to the termination of the contract and/or the assignment and may result in compensation for damages sustained by A.T.I. S.p.A.

REPORTING VIOLATIONS OF THE CODE OF ETHICS

A.T.I. S.p.A. has defined the practice through which to report commission of unlawful acts or omissions that constitute or may constitute a violation, or induce the violation of laws and regulations, values and principles laid down in the Code of Ethics, principles of internal control, company policy and standards, and/or that may cause, in the context of relations with one or more companies, damage of any kind (for example, economic, environmental, safety of workers or third parties or even just image) to them, as well as to customers, partners, third parties and, more generally, to the community. All these practices constitute the ethical policy of "escalation" of the company.

The "whistleblower" is the worker who, during work within the company, detects a possible fraud, a danger or another serious risk that may harm customers, colleagues, shareholders, the public or the company's reputation, and decides to communicate it. A.T.I. S.p.A. ensures that employees who report such code violations are not subject to any form of retaliation. The worker must then promptly report the facts, events and circumstances that they believe, in good faith and on the basis of reasonable factual elements, have determined such violations and/or conduct that do not comply with company principles.

Reports of any violations of this Code may be communicated to A.T.I. S.p.A. in anonymous or non-anonymous form through:

- The communication box located in the Production Office area
- They can be sent in paper form to the address of the company headquarters
- By email directly to the Human Resources - HR function.

In any case, the person in charge of receiving and examining reports is the Human Resources - HR function.

A.T.I. S.p.A. undertakes to protect the whistleblower from any form of retaliation or discrimination, ensuring confidentiality, except for legal obligations. To protect A.T.I. S.p.A. the senders of reports made with wilful misconduct or gross negligence that prove to be unfounded will be sanctioned.

A.T.I. S.p.A. undertakes to take charge of the reports and the related processing as well as to provide feedback on the outcome of the investigations to anyone who makes a report of violation of the Code of Ethics.

The principles of this policy do not affect or limit in any way the reporting obligations of the competent Judicial, Supervisory or regulatory Authorities in the country in which the Company operates, nor those of reporting to the control bodies that may be established.