



ACS DOBFAR S.p.A.
CODE OF CONDUCT

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1. Preamble

ACS DOBFAR S.p.A. (hereinafter ACSD) firmly believes that transparent, ethical, and law-abiding behavior is of immeasurable value in managing business activities and is the key to success. For this reason, ACSD establishes a Code of Conduct that describes the behavioral norms that promote sustainable business growth and protect the corporate reputation, in compliance with shared principles and values, applicable laws, and best practices. ACS DOBFAR S.p.A. requires all stakeholders (those with an interest in ACSD's activities or who perform activities with and for ACSD and influence its decisions or are influenced by them), including Board Members, Directors, Employees, and external third parties, to commit to respecting this Code, to collaborate with ACSD to observe and ensure compliance with its provisions, to protect the culture of Ethics and Integrity, and to contribute to building and preserving the trust of customers, investors, suppliers, workers, the population, and local communities in the Countries where ACS DOBFAR S.p.A. operates.

Compliance and full respect for the behavioral rules set out in this Code are the fundamental starting point for the proper functioning, external and internal reliability, and efficiency of ACSD. The Code of Conduct (hereinafter 'Code') sets forth the principles and consequent lines of behavior to which every individual of ACSD must conform in the exercise of business activities and determines the content of the rights, duties, and responsibilities of ACSD towards the so-called 'stakeholders' (whether they are employees, customers, Public Administration, shareholders, market, etc.).

2. Scope of application

The Code applies equally to every company activity and to all individuals (stakeholders) who collaborate in various capacities with ACSD, as follows:

- a) Members of the Board of Directors;
- b) Auditors and chartered accountants;
- c) Executives and any individual in a top position with functional and financial autonomy;
- d) Employees not holding managerial positions and employees in managerial roles lacking financial and functional autonomy;
- e) Any collaborators, namely individuals tied to ACSD through a relationship of subordination or self-employment, whose activities are nonetheless subject to the direction, control, and supervision by ACSD itself.
- f) Customers, suppliers, etc.

ACSD adopts this Code to establish the behavioral guidelines to be followed in relationships with external counterparts, collaborators, the market, and the environment. This Code will guide both internal and external activities and demands compliance from collaborators, consultants, and, within its scope, external parties with whom ACSD interacts.

3. Intervention measures: prevention, controls, and reporting.

In compliance with current regulations and in the perspective of planning and organizing business activities aimed at efficiency, correctness, transparency, and quality, ACSD, based on an already operational organizational system, identifies any additional organizational and company management measures that contribute to preventing unlawful behavior or actions contrary to the rules of this Code.

Due to the complexity of its activities and organizational structure, ACSD implements a suitable organizational framework, assigning roles to individuals with adequate capacity and competence, alongside measures ensuring that activities are carried out in compliance with the law and the behavioral guidelines outlined in this Code. ACSD diligently oversees adherence to the Code, preparing adequate information, prevention, and control tools, and intervening, if necessary, with corrective actions. To monitor and ensure the effective application of the principles and rules introduced by the Code and for any necessary function within the corporate framework organized according to the provisions of Legislative Decree 231/2001, ACSD has adopted an Organizational, Management, and Control Model (MOG), a corporate management system that identifies the operational procedures the Company develops to reduce the risk of stakeholders committing offenses or acts contrary to the Code. Furthermore, ACSD has established a Supervisory Body equipped with autonomous powers of initiative and control, which conducts periodic audits and analyses on possible risks related to the so-called "underlying offenses" as provided by Legislative Decree 231/2001.

ACSD, in compliance with the new whistleblowing regulations introduced by Legislative Decree March 10, 2023, No. 24, has further improved the existing channel for reporting. This channel is open to any stakeholder who becomes aware of actual or potential violations of laws, regulations, principles outlined in this Code of Conduct, and/or internal policies. ACSD has introduced an internal reporting channel that is quick, simple, and confidential. This reporting channel is accessible through the company's website."

ACSD opposes and penalizes any retaliatory, discriminatory, or punitive behavior towards anyone who, in good faith, reports, following the procedures established by law and the company, suspected unlawful behavior or potential violation of the Code of Conduct, the MOG, as well as corporate laws and/or regulations. Similarly, in the case of unfounded reports

made with intent or serious negligence, the reporter may face legal and disciplinary sanctions, where applicable.

4. General principles

The prevention of unlawful conduct by individuals associated with ACSD presupposes compliance with the following principles:

1. ACSD's activity is aimed at the strict compliance with applicable laws and regulations.
2. ACSD commits to ensuring that employees, executives, administrators, collaborators, suppliers, and customers - as well as personnel of any commercial partners - comply with current laws and regulations, as well as the organizational and procedural rules adopted by ACSD;
3. ACSD operates in full compliance with the law, human rights, and human dignity, condemning all forms of child labor and forced labor, modern slavery, human trafficking, and any form of exploitation, abuse, harassment, or coercion of individuals. ACSD also requires respect for these values from all those who collaborate in any capacity with the Company;
4. ACSD is against any form of discrimination based on race, gender, sexual orientation, social and personal position, psychophysical condition and health, disability, age, nationality, religion, union membership, or political and/or personal beliefs. ACSD offers equal opportunities to those who possess the required characteristics for accessing positions and roles in the company, without any discrimination, solely based on meritocratic and professional competence criteria.
5. ACSD promotes a decent and collaborative working environment, where the dignity and psychophysical integrity of everyone are respected.
6. ACSD commits to adopting preventive measures to protect safety and health in the workplace, including, where conditions apply, within temporary and mobile construction sites;
7. ACSD recognizes the importance of preventing and managing environmental impact, committing to respect the applicable legislation;
8. The behaviors, operations, and transactions decided or carried out by ACSD and by individuals acting on its behalf must comply with the law, professional correctness, principles of loyalty, transparency, and verifiability, as well as duly authorized and documented in compliance with company procedures;
9. Declarations and contributions in tax and fiscal matters must comply with the law, be truthful, consistent, and coherent;

10. Business negotiations and relationships with institutional and commercial counterparts must be conducted in compliance with the law and in accordance with the principles of correctness, transparency, and verifiability; In particular, towards representatives, officials, or employees of public administrations:
 - a. The pursuit and establishment of personal relationships of favor, influence, interference apt to directly or indirectly condition the outcome of the relationship are prohibited;
 - b. Offers of goods or other benefits, even through intermediaries, are also prohibited unless they are gifts of modest value and in line with customs;
11. ACS D prevents the occurrence and effects, direct or indirect, of situations of conflicts of interest, carried by individuals acting on behalf or for the Company;
12. ACS D respects all laws protecting employee privacy through the adoption of appropriate organizational measures.
13. ACS D commits to effectively disseminating within the company and to individuals collaborating with it the information regarding regulatory discipline and behavioral and procedural rules to be respected, in order to ensure that business activities are carried out in compliance with ethical principles. ACS D adopts adequate measures to ensure the confidentiality and security of information, intended as all data, documents, knowledge, and works, of any nature, kind, and on any support, referred to or referable to ACS D, its Stakeholders, or ACS D activities in any capacity and in any field, including so-called confidential information, meaning information that is not public or marked as "confidential." All information must be accessible exclusively to specifically authorized subjects, in compliance with the Law, best practices in data security and protection, and company procedures.

5. Relationship with Personnel

ACS D considers human resources as one of the main factors for achieving company results, within a framework of mutual loyalty and trust between the employer and the personnel. Everyone engaged in work activities for ACS D has a regular employment contract, a condition that prevents illegal forms of work such as forced labor or undeclared work. ACS D, adhering to the principles expressed in this Code and in the legislation concerning child labor, does not employ minors in its workforce except as provided by the law for educational internships.

- The employment relationship is conducted in compliance with the collective bargaining agreements of the sector (Chemical-Pharmaceutical National Collective Labor Agreement and Industry Managers National Collective Labor Agreement) and with the social security,

tax, and insurance legislation of the Italian State. The agreements define, by way of example and not exhaustively, elements related to hiring, working hours, minimum wage and remunerative aspects, leaves, freedom of association, and disciplinary sanctions.

- ACSD pursues the continuous improvement of its personnel's professionalism through regular analyses of internal training needs and the organization of training courses.
- ACSD ensures a selection and hiring process that respects the principles of transparency, impartiality, and professionalism.
- ACSD complies with all laws regarding equal opportunities and the National Legislation concerning the integration of protected categories and disabled individuals.
- ACSD encourages personnel communication with management through the Human Resources office, the Safety Office, and responsible managers.
- ACSD periodically engages with the duly elected workers' representatives, to discuss topics outlined in the National Collective Labor Agreement.
- ACSD adopts welfare tools and initiatives that allow for a better work-life balance and the well-being of individuals, such as smart working, welfare goods and services, part-time work, health insurance, solidarity time bank, leaves for same-sex families, etc.

6. Environment

All company activities comply with the current environmental regulations. ACSD commits to disseminating and consolidating among its collaborators and subcontractors a culture of environmental protection and pollution prevention, by developing awareness of environmental risks and promoting responsible behaviors in accordance with what is outlined in ACSD's *Environmental Policy document*. ACSD's Environmental Management System (EMS) is certified according to ISO 14001:2015 standards.

7. Health and Safety

ACSD ensures working conditions that comply with safety regulations and operates in full compliance with current legislation on accident prevention and worker protection in the workplace. ACSD is committed to disseminating and consolidating among its employees, contractors, subcontractors, and suppliers a safety culture, awareness of workplace risks, and promotes responsible behavior by the same. ACSD collaborates with the duly elected workers' representatives for safety, for the discussion topics outlined in the collective bargaining agreements. ACSD's Safety Management System (SMS) is certified according to ISO 45001:2018 standards.

8. Business management

ACSD believes in free and fair competition and directs its actions toward achieving competitive results that reward capacity, experience, and efficiency. The company's activities are conducted according to correct economic principles and fair market rules, in fair competition with competitors and in constant compliance with applicable laws and regulations. All actions, operations, and transactions must be lawful, correctly recorded, and authorized to enable verification and control of the implementation of expected decision-making and application models. Any action aimed at altering the conditions of fair competition is contrary to ACSD's corporate policy and is prohibited for any party acting for it. In no case can the pursuit of ACSD's interest justify conduct that is not respectful of current laws and compliant with the rules of this Code.

All ACSD administrators, employees, and collaborators involved in any capacity in the formation of the balance sheet are obliged to apply every provision concerning the truthfulness and clarity of data and evaluations. The administrative bodies must provide maximum cooperation to all control bodies. Any information known by title or function performed within ACSD must be considered confidential as it belongs to the company itself.

9. Relations with External Parties

Relationships with interlocutors, whether public or private, must be conducted in accordance with the law and in compliance with principles of correctness, transparency, and verifiability. Furthermore, all activities must be inspired by maximum correctness and completeness of information, legitimacy under a formal and substantive profile, and clarity and truthfulness in accounting checks according to current provisions.

In relations with customers and contractors, ACSD guides its activity by the criterion of quality, essentially understood as the objective of full customer satisfaction, and ensures correctness and clarity in commercial negotiations and the assumption of contractual obligations, as well as faithful and diligent contractual fulfillment. In relations with suppliers, including financial and consultancy contracts, ACSD applies this Code of Conduct. Suppliers, contractors, or subcontractors of ACSD are required to operate in compliance with current regulations and the rules provided in this Code.

In particular:

- a. It is not allowed to give or promise, to third parties, money or other benefits in any form and by any means, even indirectly, to unduly favor ACSD or third parties.
- b. It is forbidden to receive or promise, for oneself or for others, such benefits in order to

benefit third parties in their relationships with ACSD.

- c. The company does not provide contributions, benefits, or other benefits to political parties and workers' union organizations or their representatives, except in compliance with applicable regulations.
- d. Anyone, employee or collaborator of ACSD, in carrying out work activities, who receives requests or offers, whether explicit or implicit, of money or other benefits, for any purpose including the acquisition of company know-how for which specific obligations of confidentiality and secrecy exist, must promptly report it to the competent bodies (e.g., referent or hierarchical superior or company management) and consequently suspend the ongoing relationship with the interested parties pending instructions from the Company.

10. Disciplinary System and Sanctions

Compliance by the Company's employees with the Code's rules must be considered an essential part of the contractual obligations under Article 2104 of the Civil Code. The violation of the Code's rules by company employees may constitute non-fulfillment of the primary obligations of the employment relationship or a disciplinary offense according to the National Collective Labor Agreement and any other legal consequences.

Possible violations by external parties, such as collaborators, consultants, or self-employed workers, of the provisions of this Code, based on their severity, may legitimize the termination by ACSD of the contractual relationships with such parties and may also be identified ex ante as a cause of automatic contract resolution under Article 1456 of the Civil Code and any other legal consequences.

11. Dissemination

ACSD broadly disseminates the Code internally by publishing it on the company intranet and also makes it known to natural or legal persons who interact with ACSD by publishing it on the company's website.

12. Update

The Board of Directors can modify and integrate the Code, also following suggestions and indications from the Supervisory Body.