



Ramcro S.p.A.

CODE OF ETHICS

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Ramcro and the Ethic code

This code of ethics (referred to as "Code") approved by the Board of Directors of Ramcro S.p.A. on 11.01.2023 in the conviction that business activity cannot be decoupled from ethics in conducting of business and compliance with the law.

The value and importance of this Code are reinforced by the provision of specific responsibility for Entities, as a result of the commission of crimes and administrative offenses defined by Legislative Decree June 8, 2001, No. 231 "Discipline of administrative responsibility of legal persons, of companies and associations, including those without legal personality, pursuant to Article 11 of Law No. 300 of September 29, 2000" (hereinafter also referred to as the "Decree" or "Legislative Decree 231/2001").

The Company has also adopted and over time updated its Organization, Management and Control Model (hereinafter also only "Organizational Model" or "Model") in accordance with the regulations.

The recipients of the Code of Ethics

Ramcro has adopted this Code to formalize the fundamental ethical values by which it is guided and to which the Board of Directors, Employees and Executives, the Collaborators, Consultants, the Suppliers, and, in general, all those who work with the Company on the basis of even a temporary contractual relationship (hereinafter referred to as "Recipients") must adhere to in the performance of the tasks and functions entrusted to them.

Compliance with the requirements of the Code of Ethics is an integral part of the contractual obligations of Employees, including pursuant to and for the purposes of Art. 2104 e 2105 c.c., while their violation by the Recipients constitutes, as the case may be, a disciplinary offence (punishable in compliance with the applicable regulations as well as with the provisions of the Organizational Model, adopted pursuant to the Decree) and/or a breach of contract and may result in compensation for any damages resulting from such violation against the Company.

Ramcro and Sustainability

The continuous push by legislation, the market and civil society toward a reconversion of economic production systems to a sustainable perspective (so-called sustainable success), requires action by the governing body that is substantiated by the creation of value in the long term, ensuring the integration of sustainability into corporate strategies and objectives, processes and corporate governance structure.

In this context, the Company is aware of the importance of ESG (short for: Environmental, Social and Governance) issues and intends to promote a process of continuous improvement.

ESG objectives and sustainable success can be pursued with an integrated risk management system and internal control system.

With this Code of Ethics and Model 231, the Company is committed not only to pursuing proper corporate and business management, but also to spreading the culture of legality and awareness of risks and controls within the organization, helping to achieve sustainability goals.

Ramcro S.p.A.

The basic principles

Il rispetto delle leggi

Ramcro considers legality an indispensable prerequisite for the achievement of its economic, productive and social goals.

The Company is committed to enforcing compliance internally and in external relations with international, EU, national, and regional laws, applicable regulations, and commonly accepted ethical principles in the conduct of business.

The Recipients of this document are required to:

- observe and abide by the rules of the legal system in which they operate;
- refrain from committing violations of laws and regulations;
- diligently acquire the necessary knowledge of the laws and regulations applicable to the performance of its functions, as in force at the time, and conform its conduct to them.

Conduct contrary to the above precepts shall not be tolerated, nor shall lack of and adequate knowledge of them be justified in any way.

Dignity, equality and integrity

Recipients of this Code must recognize and respect the personal dignity, privacy and personality rights of any individual.

In the performance of their duties, the Recipients shall conduct themselves with transparency and moral integrity, taking into account the various social, economic, political and cultural contexts of reference and, in particular, the values of honesty, fairness and good faith.

Recipients work with colleagues of all nationalities, cultures, religions, races and walks of life; discrimination of any kind is not tolerated.

Professional diligence

The conduct of each Recipient significantly determines the quality, efficiency of the organization, and reputation of the Company.

Each Recipient carries out his or her activities with the professionalism required by the nature of the duties and functions exercised, making the utmost effort and diligently carrying out the necessary in-depth and up-to-date activities; he or she must acquire

the necessary knowledge of the applicable legal and regulatory standards, in relation to his or her functions and as in force at the time.

Conduct contrary to the above precepts shall not be tolerated, nor can lack of knowledge of them be justified in any way.

Each Employee observes, in addition to the general principles of diligence and loyalty set forth in Articles 2104 and 2105 of the Civil Code, the behavioral prescriptions contained in the collective agreements applicable to him or her.

Conflict of interest

Recipients, in the performance of their duties, must avoid situations that could generate conflicts of interest, even if only potential, or that could constitute interference with the ability to make impartial decisions.

The following situations, among others, are to be considered in conflict:

- Co-involvement (overt or covert) in activities of competitors;
- instrumentalization of one's functional position for the pursuit of interests in conflict with those of the Company or for the pursuit of interests, including those of a personal nature;
- use of information acquired in the performance of work activities for their own benefit or for the benefit of third parties and otherwise contrary to the interests of the Company;
- taking corporate offices or performing work activities of any kind with suppliers, competitors and third parties in general that conflict with the interests of the Company.

Any situation potentially capable of generating a conflict of interest or otherwise impairing the Recipient's ability to make decisions in the best interests of the Company must be immediately communicated by the Recipient to the Supervisory Board and also determines the Recipient's obligation to refrain from performing acts related to or relating to that situation.

Competition

Ramcro abides by and applies the competition laws and rules in force in the European Union and in the countries in which it operates and ensures compliance with competitive principles and full transparency in its actions.

All restrictive agreements on competition, or any other form of conscious coordination aimed at preventing, restricting or distorting competition, as well as the adoption of

business strategies that result in the abuse of one's position as an economic condition that allows the Company to operate an effective hegemony in the market and hinder free competition, are prohibited.

Recipients also undertake not to obstruct the Authorities during inspection activities, maintaining a behavior marked by maximum cooperation and providing clear, transparent and truthful information.

Fight against corruption

Ramcro considers, as fundamental factors for the development of its business, compliance with the principles of loyalty, fairness, transparency, honesty, integrity, as well as with the laws, regulations, international standards and guidelines, both domestic and foreign, applicable in the field of anti-corruption.

Any practice and form of bribery, whether active or passive, is strictly condemned and, therefore, it is forbidden to initiate or continue any kind of relationship with those who do not intend to align themselves with these principles.

In the performance of their duties, the Recipients are committed to the highest standards of moral integrity, holding conduct inspired by transparency and the values of honesty, fairness and good faith, in all relationships within and outside the Company in accordance with national and international laws on anti-corruption.

The Company does not tolerate the granting of benefits, privileges or payments that could be interpreted as acts of bribery; acts of courtesy are permitted only if the regulations so provide, provided they are of modest value or otherwise such that they do not compromise the integrity or reputation of either party and cannot be interpreted as acts aimed at acquiring improper advantages.

Countering the crimes of receiving stolen goods, money laundering and self-money laundering

Ramcro conducts its business in full compliance with the current regulations on receiving stolen goods, money laundering and self-money laundering and the provisions issued by the competent authorities, and undertakes not to engage in suspicious transactions in terms of fairness and transparency.

In particular, the Company undertakes to:

- check available information on business counterparts, suppliers, distributors, business partners, collaborators and consultants in advance to ascertain their respectability and the legitimacy of their activities before establishing business relationships with them;

- not receive payments in cash, bearer securities, or through unlicensed intermediaries or through the interposition of third parties in such a way as to make it impossible to identify the payer;
- not carry out operations that prevent the reconstruction of the cash flow;
- avoid any involvement in operations that are likely, even potentially, to facilitate the laundering of money from illegal or criminal activities, acting in full compliance with current anti-money laundering regulations and internal control systems.

In the event of evidence of any transactions resulting from illicit dealings or activities that could constitute the commission of an offense, subject to appropriate reporting to the appropriate Control Bodies, Recipients are required to undertake not to use, substitute, transfer in economic, financial, entrepreneurial or speculative activities, the money, goods and other utilities resulting from the

Combating organized crime crimes

Ramcro refrains from having relations of any nature, even if indirect or through intermediaries, with individuals (natural or legal persons) who are known or have reason to suspect that they are part of or carry out support activities in any form in favor of criminal organizations of any nature, including mafia-like organizations, those engaged in human trafficking or the exploitation of child labor, as well as individuals or groups operating for the purpose of terrorism.

Privacy

Ramcro respects the right to privacy as well as all laws and regulations in force at the time regarding the use of personal data.

Information about employees, customers, collaborators and other individuals or legal entities acquired in the course of business activities is protected and cannot be used for improper purposes. The processing of personal data is carried out with respect for the fundamental rights and freedoms, as well as the dignity of the persons concerned, as provided for in the current regulatory provisions. The data and information acquired are kept for a period of time not exceeding that necessary for the purposes of collection and cannot be used for purposes unrelated to the business activity.

Information Technology

Ramcro, in carrying out its business activities and pursuing its objectives, considers the use of appropriate information systems to be of strategic importance.

Maintaining a good level of cybersecurity is essential for:

- ensuring information security;

- counteract acts of cybercrime;
- ensure the security of managed information.

Confidentiality

In the course of its business, Ramcro has access to confidential information, the misuse of which can cause significant adverse consequences. For this reason, the Company is committed to:

- carefully guard information and any documents that it comes into possession of or otherwise acquires the availability of as part of its relationship with its client;
- use such information shrewdly, preventing its inappropriate disclosure from harming the client or other parties involved;
- not use such information for corporate advantage.

The same principles also apply to confidential information received from any interested party concerning corporate social responsibility issues.

The management of internal relations

The selection and management of personnel

Loyalty, ability, professionalism, seriousness, preparation, and dedication of the staff represent determining values and conditions for achieving Ramcro's goals.

As part of human resource development, the Company is committed to creating and maintaining the necessary conditions so that the skills, competencies, and knowledge of each Employee can further expand, in order to ensure the effective achievement of the Company's objectives. For this reason, Ramcro pursues a policy aimed at the recognition of merit while respecting equal

The Employee is required to cultivate and solicit the acquisition of new skills, abilities and knowledge, as well as to operate, in the performance of his or her activities, in full compliance with the organizational structures, also in order to enable the proper and orderly activation of the chain of internal controls and the formation of a precise and articulated framework of responsibilities.

Recipients must give express and constant consideration to respect for the person, his or her dignity and values, avoiding any discrimination based on sex, racial and ethnic origin, nationality, age, political opinions, religious beliefs, state of health, sexual orientation, economic and social conditions.

As part of the selection process - conducted in compliance with the principles set forth in this Code of Ethics, equal opportunities and without any discrimination whatsoever - the Company works to ensure that the resources acquired correspond to the profiles actually needed for the requirements, avoiding favoritism and facilitation of any kind.

No form of irregular employment is tolerated: all Company personnel are hired under regular employment contracts and the relationship is conducted in full compliance with the collective bargaining regulations of the relevant industry, tax, social security and insurance regulations, as well as immigration provisions.

Harassment in the workplace

Ramcro non tollera alcun tipo di relazione di lavoro che dia origine a molestie o ad atteggiamenti comunque riconducibili a pratiche di mobbing. Rientrano in tale ambito, a titolo esemplificativo e non esaustivo:

- creare un ambiente di lavoro intimidatorio, ostile o comunque discriminatorio nei confronti di colleghi;
- ostacolare prospettive di lavoro individuali altrui per meri motivi di competitività personale o di altri dipendenti;
- subordinare decisione di rilevanza per la vita lavorativa del destinatario all'accettazione di favori sessuali o alle diversità personali e culturali;
- indurre i propri collaboratori a favori sessuali mediante l'influenza del proprio ruolo;
- alludere a disabilità e menomazioni fisiche o psichiche o a forme di diversità culturale, religiosa o di orientamento sessuale.

Alcoholic substances, drugs and smoking

Each Recipient must contribute to maintaining an environment marked by decorum and sobriety.

Each Recipient of this Code is strictly prohibited from using narcotics and any substance capable of altering mental and physical balance.

Smoking is prohibited in the workplace, except in specially designated areas.

The protection of corporate assets

Company property, plant and equipment are used for reasons of service, in accordance with current regulations, unless otherwise provided.

Under no circumstances is it permitted to use the Company's assets and IT resources for purposes and purposes contrary to the law, public order or morality, or to commit

or induce the commission of crimes. It is also forbidden to engage in conduct that may damage, alter, deteriorate or destroy computer systems, programs and data of the Company or third parties.

No Recipient is permitted to make audiovisual, electronic, paper or photographic recordings or reproductions of company documents, property, facilities or equipment, except in cases where such activities are part of the normal performance of the functions entrusted to him/her.

It is also forbidden to use the company's resources for consultation, storage, dissemination and, in general, for any activity that includes materials with child pornography content or for which one does not have the rights of use (for example: software without a license to use it, watching nonfree films, etc.).

The management of external relations

Relations with the Public Administration and the Judicial Authority

Relations with the Public Administration may be maintained, in the name and on behalf of the Company, only by the functions and resources specifically appointed. Any action that may impair the autonomy and impartiality of judgment of representatives of the Public Administration is prohibited.

On the occasion of inspection activities, Recipients undertake to provide the Public Administration and the relevant Authorities with the widest cooperation, making themselves available to promptly provide clear and truthful information.

Consistent with this principle, by way of example only, the following conduct is prohibited:

- promise, offer or in any way pay or provide, to individuals who hold the position of public officials or public service appointees sums, goods in kind or other benefits that go beyond normal courteous relations, even as a result of unlawful pressure in order to promote or favor the interests of the Companies; the aforementioned requirements cannot be circumvented by resorting to different forms of aid or contributions, such as appointments, consultancies, advertising, sponsorships, employment opportunities, business opportunities
- Hold and undertake such behavior and actions towards spouses, relatives or relatives-in-law of the persons described above.
- Hold conduct otherwise intended to improperly influence the decisions of officials dealing with or making decisions on behalf of the Public Administration.

In dealings with the Judicial Authority, Recipients are required to provide effective cooperation and to make truthful, transparent and exhaustively representative statements of the facts.

The Company does not tolerate forms of conditioning that may in any way influence the statements to be made to the Judicial Authority.

In general, in the conduct of relations with the Public Administration, the Recipients of this Code must model their behavior in order to avoid violating the provisions of the Three-Year Plans for the Prevention of Corruption (ex L. 190/2012) as well as the Codes of Conduct (ex DPR 62/2013) of the Public Administration.

Relations with political parties and labor organizations

Relationships with political parties, trade unions and other interest-bearing associations are held in compliance with the rules of this Code, having particular regard to the principles of impartiality and independence.

Strictly institutional forms of collaboration aimed at contributing to the realization of events or activities, such as conducting conferences, seminars, studies, research, etc., are permitted, provided they are not intended to obtain undue favors.

Customer relations

Ramcro is guided by principles of transparency, equality, fairness and free competition and ensures fairness and clarity in business negotiations and in the assumption of contractual obligations, as well as diligent performance.

All Recipients are committed to operating in a manner that best meets customers' expectations and to relating to them with courtesy, openness and respect. Customers must always have access to all information necessary for appropriate and economically sound decision-making.

In initiating business relationships with new customers and in managing existing ones, Recipients must avoid having relationships with parties involved in illegal activities or, in any case, lacking the necessary requirements of ethicality and commercial reliability.

Relationships with suppliers

Ramcro entertains business relationships exclusively with suppliers who offer the highest guarantees in terms of fairness and ethics and contractually commits them to comply with the laws, to become aware of and adhere to the principles enshrined in this Code. No forms of collaboration are initiated with those who do not accept these conditions; the Company contractually reserves the right to take all appropriate measures in the event that the supplier violates the rules enshrined in the Law or in this Code.

The selection of suppliers of goods or services and, in any case, the purchase of goods and services of any kind are carried out by the appropriate functions delegated for this purpose, on the basis of objective and documentable criteria, marked by the search for the best balance between economic advantage and quality of performance.

Within the scope of these relationships, Recipients are required to:

- check available information on suppliers in advance to ascertain their respectability and the legitimacy of their activities;
- demand the enforcement of contractually agreed conditions;
- require suppliers to abide by the principles of the 231 Model and this Code of Ethics through appropriate provision in contracts;
- operate within the framework of current regulations and require timely compliance.

Gifts, benefits and other utilities

Recipients are prohibited from offering, disbursing, promising or granting to third parties as well as accepting or receiving from third parties, directly or indirectly gifts benefits or other utilities and also in the form of sums of money, goods or services. The offering of gifts or benefits free of charge is exclusively permitted to the extent that it does not exceed the normal manifestations of courtesy permitted by business practices.

The aforementioned donations, however, must be such that they cannot create - in the other party, that is, in an unrelated and impartial third party - the impression that they are aimed at acquiring or granting undue advantages, or such that they otherwise create the impression of illegality or immorality.

It is also not permitted to request or accept directly or through an intermediary, money, gifts or favors for any reason whatsoever, except for gifts or utilities of modest value, where this constitutes or could potentially constitute consideration for a service in some way related to the employment relationship with the Company.

Accounting and tax data

The General principles

Ramcro provides, in the financial statements and other accounting and tax documents required by current regulations, a true and fair representation of the company's business. Accounting records shall be kept in accordance with the principles of transparency, truth, completeness, clarity, precision, accuracy and compliance with applicable regulations.

The accounts are set up on generally accepted accounting principles and systematically record the events arising from the management of the Company. . The company respects and observes all regulations of national and international tax law for the purpose of direct and indirect taxes.

Traceability

Adequate documentation must be kept in support of each transaction, allowing for easy accounting records, reconstruction of the transaction, and identification of any liabilities.

This documentation must allow identification of the reason for the transaction that generated the recognition and its authorization. Supporting documentation must be easily retrievable and stored according to appropriate criteria that allow it to be easily consulted by both internal and external entities empowered to audit.

Recipients are required to cooperate in the proper and timely recording of all management activities in the accounts and to work to ensure that management events are correctly and timely represented so that the administrative-accounting system can achieve its purposes.

Relations with supervisory bodies

The Company undertakes to maintain relations with the Control Bodies in accordance with the principles of utmost diligence, professionalism, transparency, cooperation and helpfulness, respecting the institutional role of these figures and giving punctual and prompt execution to the prescriptions and any required fulfillments.

Accounting data, fiscal data, and documents shall be made available accurately and drafted in clear, objective, and comprehensive language so as to provide accurate, complete, faithful, and truthful information while avoiding and otherwise reporting, in the appropriate form and manner, situations of conflict of interest.

Health, safety in the workplace and environmental protection

The Integrate Management System

Ramcro has obtained Quality, Environment and Safety certification in accordance with ISO 9001, ISO 14001 and OHSAS 18001 regulations and reference standards, forming the Integrated Management System. This System has made it possible to ensure compliance and maintenance over time of compliance with environmental regulations and current safety regulations, requirements that Ramcro considers essential for proper management of all activities.

Ramcro guarantees its customers the appropriate quality and safety standards; to this end, the Company is committed:

- to provide products with technical characteristics corresponding to the required application needs, quality requirements, mandatory requirements and as free from defects as possible;
- to increase its visibility through customer loyalty;
- to reduce durre the costs of Non-Quality.

Health and Safety

Ramcro pays special attention to accident prevention and the protection of Workers' health and safety in the workplace.

Specifically, it carries out its activities under such technical, organizational and economic conditions that adequate prevention and a healthy and safe working environment are ensured and ensures a working environment that complies with current health and safety regulations.

The basic objectives, principles and criteria for prevention in occupational health and safety are as follows:

- comply with current occupational health and safety legislation.
- prevent occupational injuries and illnesses;
- ensure the continuous improvement of health and safety management;
- assess, manage and minimize risks in relation to the knowledge gained from technical progress;
- take into account the degree of technical development in the adaptation of machines, equipment and any other devices in use;

- adhere to ergonomic principles in the organization of work and adapt work to man, especially in the design of workplaces, the choice of equipment and the definition of working and production methods;
- Replace what is dangerous with what is not dangerous or is less dangerous;
- provide Workers with personal preventive and protective equipment appropriate to the risks to be prevented, the working conditions, and the Worker's needs and requirements;
- planning prevention, aiming for a coherent whole that integrates in it technique, work organization, working conditions, social relations and the influence of factors in the work environment;
- give appropriate instructions to Workers;
- ensure the health supervision of Workers;
- participate in consultations and periodic meeting on occupational health and safety protection;
- provide adequate and sufficient information, education and training to Workers
- plan measures deemed appropriate to ensure the
- improvement of safety levels over time, including through the adoption of best practices;
- provide emergency measures to be implemented in case of first aid, fire fighting, evacuation of workers and serious and immediate danger;
- use warning and safety signs;
- manage the maintenance of environments, equipment, facilities, with emphasis on safety devices in accordance with the manufacturers' indication;
- ensure the signing of the work and service contract and, related Single Document of Evaluation of Interference Risks, in all cases provided for in the regulations, as well as carry out prior to the signing of the contract the verification of the technical and professional requirements of the contractors.
- utilizzare correttamente le macchine ed impianti, l'attrezzatura di protezione individuale, nonché i dispositivi di sicurezza;

In addition, Workers are required to:

- report any work situation involving serious and immediate danger, as well as any defect in protective systems;
- participate in fulfilling the requirements imposed on health protection to enable the employer to ensure that the working environment and conditions are safe and hazard-free;
- take part in training activities;

contribute, together with the Employer, Managers and Supervisors, to the fulfillment of the obligations provided for the protection of health and safety in the workplace.

Every activity, both at the apex levels, when making decisions, and at operational levels, when implementing them, should be oriented toward compliance with these principles.

Environmental Protection

Ramcro strives for punctual compliance with all applicable legal requirements in the environmental field, including by involving and raising the awareness of personnel directly involved in the management of the impacts generated, as well as individuals who, although unrelated to the corporate structure, are linked to the Company by negotiating relationships for the management of activities with environmental impact. Specifically, the Society:

- takes measures to limit and - if possible - cancel the negative impact of economic activity on the environment.
- favors taking measures to prevent any harm to the environment;
- promotes the values of sharing the principles of the Code among all Recipients.

The preparation of any type of environmental documentation required by law (both hard copy and computer), as well as the accounting record of documents pertaining to transactions with third parties that have a connection, even indirectly and potentially, with environmental management, is governed by criteria of clarity, truthfulness and fairness.

The rules for implementing the Code of Ethics

Adoption and dissemination

The Code and any future updates to it are defined and approved by the Company's Board of Directors.

The Code is disseminated, including in electronic format, to all resources through a special communication from the Chief Executive Officer.

A copy of the Code is posted on the bulletin board on the Company's premises. New employees are given this Code together with the Organizational Model in order to ensure that they have the knowledge considered of primary importance.

Ramcro carefully monitors compliance with the Code by setting up appropriate information, prevention and control tools and intervening, where appropriate, with corrective actions.

The Code is subject to review by the Company's Board of Directors.

The review activity takes into account input received from Employees and third parties, as well as regulatory developments and the most established international practices, and experience gained in the application of the Code itself.

Any changes to the Code introduced as a result of this review activity shall be published and made available in the same manner of disclosure as above.

This Code takes effect from the date of its approval by the Board of Directors.

The Supervisory Body

The task of supervising the operation of and compliance with this Code is entrusted to the Supervisory Board (also "SB"), endowed with autonomous powers of initiative and control, appointed by the Board of Directors of the Company pursuant to Legislative Decree 231/2001.

Subject to compliance with any safeguards provided for in current regulations or collective agreements and without prejudice to legal obligations, the SB is entitled to receive requests for clarification, as well as reports of potential or actual violations of this Code.

The Supervisory Board is obliged to strict confidentiality and operates according to impartiality, authority, continuity, professionalism and autonomy. Moreover, the Supervisory Board operates with wide discretion and with the full support of the Company's top management, with which it cooperates in absolute independence.

The whistleblowing system

Pursuant to Legislative Decree 24/2023, violations subject to reporting concern conduct, acts or omissions that harm the interest or integrity of the Company and consist of:

Administrative, accounting, civil or criminal offenses;

unlawful conduct relevant pursuant to Legislative Decree 231/2001 or violations of the Organization, Management and Control Models adopted pursuant to Legislative Decree 231/2001;

offenses falling within the scope of European Union acts relating to, but not limited to, the following areas: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; and environmental protection;

acts or omissions affecting the financial interests of the European Union and/or concerning the internal market.

acts or omissions affecting the financial interests of the European Union and/or concerning the internal market.

Reports will be handled consistently with the "Whistleblowing Policy"

adopted by the Company in order to enable reports to be made about

violations of which the reporter has become aware in the context of his/her

work context and/or the work or professional activities performed.

Reports can be made by means of computer platform that can be reached at the following address:

wb.ramcro.com

Reporting channels ensure, including through the use of encryption tools, the confidentiality of the reporter's identity, as well as the content of the report and related documentation.

The Company guarantees the protection of the whistleblower from any form of retaliation and/or discrimination.

Protection against acts of retaliation is extended to all persons connected in a broad sense to the organization and/or the person of the reporter as defined in Article 3 of Legislative Decree 24/2023.

It is recalled that reporting entities or persons may not suffer any retaliation under Article 17 of Legislative Decree 24/2023.

Le misure di protezione del segnalante si applicano in conformità a quanto disciplinato nel Capo III del D. Lgs. 24/2023.

The whistleblower protection measures are applied in accordance with the provisions of Chapter III of Legislative Decree 24/2023.

With respect to reports made by individuals who have declared their personal details and are in bad faith and/or are proven to have slanderous/defamatory content, the measures provided for in Par. 5 "Disciplinary and Sanction System" of the Organization, Management and Control Model will be activated, as well as appropriate legal protection actions evaluated. Outside the cases of liability for libel or slander, the submission of a report under this procedure does not constitute a breach of obligations arising from the employment relationship.

Disciplinary measures

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations provided for Employees of the Company, pursuant to Articles 2104 and 2105 of the Civil Code, as well as for Consultants, Collaborators, Suppliers and those who become Recipients of this Code, with reference to the existing contractual relationship.

Violation of the measures put in place to protect "whistleblowers" or the submission of unfounded reports with malice or gross negligence are also subject to sanctions.

Ramcro, through the bodies and functions specifically designated for this purpose, shall ensure that sanctions proportionate to the respective violations of the Code and in accordance with the current provisions on the regulation of labor relations are imposed with consistency, impartiality and uniformity.

Sanctions for the Company's employees are consistent with the measures specified in the applicable collective bargaining agreements and are detailed in the Company's Organization, Management and Control Model.

Such violations are sanctioned by the relevant bodies according to internal corporate rules and as expressly provided for in the relevant contractual clauses.