

**Code of Ethics and Conduct:
 Principles, Behaviors, Values and Objectives**

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1 Preliminary remarks

This Code of Conduct expresses the principles and ethical values to be considered as an essential reference in the conduct of business and corporate activities for the achievement of corporate primary objectives.

These principles and ethical values are adopted by managers, employees, company representatives such as directors and auditors, as well as Company's customers, collaborators and suppliers and, in general, all the stakeholders who interact with the Company.

The term "Company" refers to COELME S.p.A. , Egic and any subsidiary of COELME.

This code is available on the company's website at www.coelme-egic.com.

2 Principles

2.1 Compliance with the law

Compliance with the law is an essential principle for the Company.

While performing their duties, company representatives, employees and collaborators are required to comply with the laws and regulations provided for by the legal system in force in the country where the Company is operating.

In addition to adhering to the general principles of diligence and good faith, all employees must comply with the behavioral instructions contained in their applicable labor contracts.

Under no circumstances may the pursuit of the Company's interests justify the breach of laws and regulations.

2.2 Preserving Company's assets, the quality and efficiency of its organization, and its reputation

The set of tangible and intangible assets, together with the quality and efficiency of the organization and together with the reputation of the Company, constitute the invaluable corporate assets necessary for the subsistence and operation of the Company itself over time.

The protection of such assets is determined to a substantial extent by the conduct of each company representative, employee and collaborator, who is required to contribute to their safeguard and, in particular, to the reputation of the Company, both in and outside the workplace.

Any conducts not complying with the provisions enshrined in this code may cause substantial damage to the Company.

2.3 Protection of human resources

The Company recognizes that human resources are an indispensable asset for the development and success of the Company and is committed to developing their skills, abilities and potential. The assessment of the professionalism and skills of individual human resources will be carried out with reference to the level of skills acquired and to merit, i.e. to the contribution that each person will have made to obtaining corporate results.

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The Company will take on the responsibility of providing all employees and collaborators with adequate training, appropriate to the type of activity and responsibility to which each of them is called, to the contractual level and, also, to the type of collaboration in place.

2.4 Respect for each individual

Each company representative, employee and collaborator recognizes and respects personal dignity, privacy and rights of the personality of all individuals.

Every activity and service must be carried out guaranteeing and ensuring the respect for the individuals, and this regardless of race, social condition, religion, political faith, union membership, age, sex and sexual orientation, with the obligation to refrain from discriminatory practices of any kind, by anyone.

These principles also apply in the relations with colleagues, Collaborators or Managers as well as with Third Parties.

The Company undertakes to avoid any form of exploitation of child labour and to ensure the application of the regulations on the protection of women.

The Company undertakes not to entertain, either directly or indirectly, financial, economic and commercial relations with parties that operate in violation of the regulations on the protection of child labour and the protection of women and/or that engage in the illegal procurement or use of labour forces, through trafficking of immigrants or the slave trade.

2.5 Departments, responsibility and control

In carrying out their functions, each Company representative, employee and collaborator must behave with transparency and honesty, assuming the responsibilities that pertain to them by reason of their functions and the tasks they have been assigned; they must be reliable and determined to achieve the defined objectives.

Each manager must behave in an exemplary manner, demonstrating dedication to work, loyalty and competence, setting their staff clear, ambitious but realistic objectives; carrying out their role by trusting their staff and, with constant reference to company regulations, granting them as much responsibility and freedom of action as possible, taking into account their personal and professional aptitudes, as well as their professional and non-professional experience. Managers must also be available and listen to their collaborators with regard to issues concerning professional activities, guaranteeing the support requested and/or necessary.

Each manager performs the function of organization, coordination and control of their subordinated staff and is responsible for the performance of any functions delegated to their collaborators, as well as the conformity of their work to this code.

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3 Ethical behaviour

3.1 Legal compliance

Comply with the laws and regulations of applicable jurisdictions.

3.2 Human rights and labor practices

Ensure respect for all internationally proclaimed human rights and avoid being the cause of and/or accomplice to any violation of them; this is particularly true for the rights of the most vulnerable, such as children, women, migrant workers or local minorities.

3.2.1 No to forced labor

Do not use the work of people enslaved or forced to work as well as people who are victims of human trafficking.

3.2.2 No to child labor

Do not hire or engage the services of workers under the age of 15, in accordance with ILO (International Labour Organization) Convention 138.

Do not hire workers under the age of 18 for hazardous work under ILO Convention 182, subject to the principle stated above.

3.2.3 No discrimination, respect for workers

Promote equal opportunity and treatment of workers, regardless of age, color, gender, identity, sexual orientation, marital status, race, ethnicity, nationality, religious belief, political faith, membership in labor organizations, social background, or disability.

Refuse to tolerate, toward any person, any attitude/treatment involving mental cruelty, sexual harassment or discrimination, including gestures, language, physical contact and any coercive, threatening, abusive or exploitative behavior.

3.2.4 Working hours, wages and employee benefits

Recognize the right of workers to associate with, or join, existing trade unions and engage in collective bargaining; this without any disadvantage of being a member or non-member of workers' organizations or unions.

Comply with all applicable wage and hour regulations.

Pay fair wages for the work performed and comply with all applicable wage laws while adhering to contractual minimum wages.

Comply with all legal requirements applicable to the employment of cross-border and/or non-EU personnel.

3.2.5 Worker health and safety

Act in accordance with applicable workplace health and safety laws and regulations, and strive to provide safe working conditions.

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Ensure that workers are trained on health and safety in the workplace in accordance with legal requirements, providing timely updates as necessary and/or prescribed, to make workers adequately prepared to deal with the residual risks present in the various work activities.

Implement and maintain a reliable management system to protect the health and safety of workers.

3.3 Environmental protection

Act in accordance with applicable environmental laws and regulations.

Minimize the pollution produced by the working activities and/or by the products and make continuous improvements in environmental protection.

Commit to increasing energy performance of company operations, products and facilities.

Implement and maintain a reliable environmental management system.

Pursue responsible management of natural resources and the use of solutions to improve the environmental impact of company activities.

3.4 Fair operating practices

3.4.1 Fighting corruption

Do not tolerate any form of bribery or corruption and do not grant, offer or promise anything of value that is not insignificant to public officials or a private sector counterparty to influence actions that benefit you and/or the Company.

Do not solicit, induce or receive, directly or through third parties, an undue advantage of any kind, for oneself or others, or accept the offer or promise, to perform or refrain from performing acts in violation of one's legal, professional or contractual duties relating to the activity of competence.

3.4.2 Fair competition, antitrust laws, and intellectual property rights

Act in accordance with national and international competition laws and respect the intellectual property rights of others.

3.4.3 No conflict of interest

Avoid conflicts of interest that may affect relationships with any counterparty in connection with company business.

In the event of any conduct that may constitute a potential conflict of interest in the performance of one's activities, communicate the existence of such situations to the Company's administrative and auditing bodies.

3.4.4 No to money laundering and terrorist financing

Do not directly or indirectly facilitate money laundering or terrorist financing.

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3.4.5 Data confidentiality

Treat personal data confidentially and responsibly, respect everyone's privacy, and ensure that personal data is effectively protected and used only for its intended, legitimate purposes and in accordance with applicable laws.

3.4.6 Export control and customs

Comply with applicable export control and customs regulations.

3.5 Responsible sourcing of minerals

Avoid the use of products and/or raw materials from conflict-affected and high-risk areas, as well as avoid contributing, directly or indirectly, to human rights violations, the financing of armed groups or similar negative effects.

3.6 Relations with stakeholders

Ensure that the Company's stakeholders (suppliers, employees, consultants, clients, financial institutions, etc.) respect the principles of this Code of Conduct in their relations with the Company.

4 Values

4.1 Integrity

Legality, correctness, honesty, fairness and impartiality of behavior inside and outside the Company are a common way of feeling and acting of the Company.

In sharing these principles, lasting relationships are established with customers and suppliers, marked by general transparency in relations with third parties, as well as appropriate and fair recognition of the work of employees.

4.2 Transparency

The Company, within the limits imposed by the laws on confidentiality and suggested by the need for maximum protection of corporate know-how and organisational and management methods, undertakes to provide all its stakeholders with clear, complete and timely information on the economic, social and environmental impact of the Company's activities.

4.3 Personal responsibility

Working in the Company entails a commitment to establishing a relationship of trust with colleagues and, more generally, with all internal and external collaborators.

Committing loyally and effectively to achieving the Company's objectives, being aware of duties and responsibilities is considered essential.

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4.4 Consistency

Being consistent means to commit to operate daily in every action according to what is defined in this code, with constant reference to the values and principles herein defined. They are considered to be essential for all corporate actions and activities: in strategic planning at the highest level as well as in the pursuit of all objectives and in operational management down to the smallest detail.

4.5 Collaboration and enhancement

The Company is committed to enhancing the experience and developing the skills of all workers, to promoting collaboration and the exchange of knowledge, so that work is a source of satisfaction and pride for people, as well as a relevant factor for the success of the Company itself.

The Company is determined to reward behavior that is consistent with the mission and values of this code.

The Company intends to promote, through the culture of dialogue and collaboration, the dissemination of information and the spirit of belonging to a single and integrated group.

4.6 Merit and determination

While pursuing its mission, the Company identifies areas of activity and development plans, in order to increase its value and to be increasingly competitive in the market.

Merit and determination in pursuing goals characterize the process of recognizing and valuing workers.

5 Primary objectives

5.1 Value creation

The Company is committed to combining economic and social values with the objective of meeting, over time, the legitimate expectations of all those who come into contact with it: customers, workers, shareholders, suppliers, institutions and local communities.

5.2 Quality and excellence of service

Customer satisfaction represents a fundamental element for the growth of the Company that intends to be perceived as a solutions provider, able to understand the needs and offer high quality services.

Organization, professionalism and culture of the Company evolve having as reference points the ability to listen to customers (internal or external) as well as the service intended for them, to whom reliable answers should always be provided.

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5.3 Efficiency, innovation and continuous improvement

The Company is committed to pursuing a process of innovation and continuous improvement of its management processes with speed and determination, in order to rationalize and optimize the use of human resources, time, as well as financial and technological resources.

6 Reporting violations of this code

Employees and anyone interacting with the Company may report violations of this code through a secure mechanism that can be accessed by simply sending an email to the Compliance Officer at odv@coelme.it

Messages concerning EGIC may also be sent to the following e-mail address: compliance@egic.fr

7 Compliance Handbook

This code of conduct, which contains the collection of principles and ethical values that are fundamental for COELME Group, is complemented by the Compliance Handbook, which includes a set of specific rules and prescriptions, of general application, with the mapping of the procedural and organizational devices implemented by each company of the Group in order to deploy the organizational and procedural system in a hierarchical and harmonious manner.