

CODE OF ETHICS

Approved by the Sole Director on 25.11.2024

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COMPANY PRESENTATION

INGLESE Srl

Address: Via Papa Giovanni XXIII, 4 - Quarto Inferiore, 40057 Granarolo dell'Emilia BO Tax code: 03059880371 / VAT No.: 00592601207

Recorded in Bologna's Business register: Enrolment no.: 03059880371.

INGLESE Srl, founded from the sole corporation which Roberto Inglese registered in Bologna in 1956, it has been active on the market supplying to Graphic Arts for over 65 years, with Italian and foreign partners.

The company is a wholesaler of machines, equipment and items for the printing industry, as well as being a sales rep, with and without warehousing facilities, in machines and accessories for the graphics industry.

GENERAL PRINCIPLES

As part of their work, the Company Directors, Employees and Co-workers have to strictly adhere to the current laws, Code of Ethics and internal regulations, as well as avoid situations which may lead to conflicts of interest, steering clear of behaviour which could potentially be seen as a crime or other forms of illegal activity.

Everyone has to work diligently to protect the company's assets, using them sparingly and carefully while pointing out any improper usage.

CIRCULATION OF THE CODE OF ETHICS AND ITS RECIPIENTS

The contents of the Code of Ethics are binding on the behaviour of all of INGLESE S.r.l.'s company directors, its managers, employees, consultants, stakeholders and anyone who undertakes any form of direct or indirect working relations, either on a temporary or permanent basis.

Those covered by the Code's rules are bound to comply with its contents and align their behaviour and actions with the principles expressed therein.

The company is committed to making reference to the observation of the Code's contents in all the financial relationships it undertakes and circulate it as much as possible.

For this purpose, the Code is made available to any company representative and it is also published on the website.

LEGALITY

The recipients need to align their behaviour with current legislation in the countries where the company and recipients themselves are working, including EU and international countries, applicable on a case-to-case situation.

INGLESE S.r.l. operates in compliance with current legislation. As part of their respective skills, all the recipients are expected to be familiar with and observe the protocols sanctioned by international, EU, national, regional and local institutions with particular reference to regulations concerning corporate law, and the protection of personal rights and freedom, health and work safety.

IMPARTIALITY

In the decisions that influence relations with stakeholders (for example: the choice of clients, relations with shareholders, management of staff, the selection of suppliers, relations with the community and institutions), the company avoids any form of discrimination against the age, sex, sexuality, health condition, race, nationality, political opinions or religious beliefs of those with whom it is interacting.

PERSONNEL POLICIES

INDIVIDUAL WORTH

Staff and their co-workers are an added value for the company to promote and defend, with a view to improving and expanding the overall wealth of experience and know-how held by the company itself.

The recipients guarantee maximum earnest, diligence and accuracy when performing their roles, duties and tasks entrusted to them and to honour commitments made in contracts and obligations.

The recipients need to guarantee the right to working conditions which respect an individual's dignity. This is why workers must be protected against acts of abuse, including psychological abuse, and attitudes and behaviour that is discriminatory or harmful towards people, their beliefs and preferences must be stamped out. Sexual molestation is strongly condemned as are conversations or behaviour that could offend a person's sensitivity.

ENHANCEMENT OF HUMAN RESOURCES

The company recognises that human resources are a key factor in its development. Managing human resources is based on respect for the individual and professionalism of each one of them.

The company offers equal opportunities to everyone, based on their professional qualifications and individual skills, without any form of discrimination as mentioned above.

A POSITIVE WORK ENVIRONMENT

The company aims to maintain and promote a positive work environment, inspired by an individual's freedom, dignity and inviolability, as well as by principles of correctness with interpersonal relations, which allow every recipient to perform their work as best as possible.

The work environment which all employees, managers and co-workers work in, is built around reciprocal collaboration and works in favour of a sense of belonging respecting the personality of each individual, without prejudices, intimidations or illegal conditioning. When it comes to managing hierarchical relations, any form of impolite or uncivilised behaviour is strictly forbidden as is the abuse of power, and there is an obligation to use one's position in compliance with public duties and those of the person, to keep up a positive and encouraging work environment.

EMPLOYEES' OBLIGATIONS

Each employee is requested to become familiar with this Code of Ethics and reference standards/policies governing the activity, within their department and role.

Company employees are obliged to avoid behaviour in contrast with these rules, to contact their superiors if they require clarification on how to apply them, as well as rapidly inform their superiors or company Directors of any possible violations or any requests they have received to break the rules.

It is essential for those who receive this information to withhold the identity of the person who reported it.

It is the duty of each head of a company department, to behave accordingly in order to set an example to their own employees/co-workers and prevent any kind of uncivilised or vengeful behaviour.

DUTIES OF MANAGEMENT AND THOSE WITH HIERARCHICAL AUTHORITY

The managers, like all employees and those with hierarchically superior responsibilities for the role covered, are particularly bound to observe the current legislation and present Code.

They are also bound to monitor employee's observation of standards/policies and the Code, adopting for this purpose the measures and controls required, always respecting the individual and using civilised methods.

Each company employee, who is given operating responsibilities, is obliged to:

- show example to their co-workers through their own behaviour in the company, by applying all the principles that make up this Code of Ethics with a view to upholding a positive and encouraging work/corporate climate, as well as one which motivates staff and third parties;
- urge employees and third parties to observe the Code, and raise issues concerning its correct application or failure to do so;
- work until employees understand that respect for the standards is an essential part of the quality of work performance;
- rapidly refer one's findings and information supplied by employees, as well as any coming from outside the company, concerning possible cases of regulation violation, especially if it involves molestations or discrimination linked to age, sex, sexuality, race, health condition, nationality, political opinions or religious beliefs;
- take immediate corrective action when the situation requires it, again always while respecting the individual;
- prevent any kind of retaliation and ensure the necessary privacy towards employees, highlighting any irregular behaviour or violations.

Those holding senior positions collaborate actively with every control carried out by the company.

BEHAVIOURAL OBLIGATIONS

All the recipients commit to behaving loyally with a view to respecting their contractual work obligations and what is set out in this Code of Ethics, guaranteeing the performance level requested of them and respecting the commitments they have made.

The recipients commit to working to the highest standards of quality and safety as well as behaving correctly, politely and transparently when performing their duties, in compliance with the standards set

out in this Code of Ethics and in compliance with company procedures and the operating instructions adopted by the company.

CORRECT USE OF COMPUTER RESOURCES AND COMMUNICATION SYSTEMS

Phone, email access, Internet and Intranet systems belong to the company. These systems aim to improve work performance.

Each co-worker should, therefore, bear in mind that:

- use of e-mail and Internet at the company must be for legitimate professional purposes, while use of the phone may be for other purposes, if authorised;
- all the information entered into the computer system belongs to the company; each individual co-worker is responsible for keeping all their passwords and ID codes secret in order to prevent unauthorised access to company data and information;
- only software programs purchased by the company for the purpose of carrying out its own activities can be used on company computers;
- it is strictly forbidden to reproduce or duplicate software programs: any co-worker who wittingly or unwittingly copies software material, places the company and themselves at the risk of serious sanctions;
- it is also strictly forbidden to possess or illegally distribute computer or telematic system access codes, as well as install equipment which can intercept, impede or interrupt computer or telematic communications.

Each co-worker is also required to:

- meticulously adhere to company safety policies, in order not to compromise the functioning and protection of computer systems;
- avoid sending menacing or offensive e-mails, using inappropriate language either when communicating verbally or in writing, making unacceptable comments which might offend someone and/or damage the company's image; avoid sending e-mail messages which might commit the company to third parties while not being authorised to do so; take the utmost care of assigned or supplied mobile devices and not hand them over to third parties. All the data and information stored in the company computer and telematic systems, including e-mail messages, are owned by the company and should only be used for company activities, in compliance with the limitations and procedures established by the company itself.

RELATIONS WITH THE PUBLIC ADMINISTRATION AND PUBLIC REGULATORY BODIES

It is forbidden to offer money or gifts to managers, officials or staff within the Public Administration or to their relatives, whether they are Italian or from other countries, unless they are merely inexpensive gifts.

Any relations with institutions and the Public Administration, Bodies, various Associations, including political and trade unions, must be carried out correctly, impartially and independently and are restricted to the company departments which have been appointed and authorised to do so.

OFFENCES AGAINST THE PERSON

Recipients commit to observing the current national, EU and international standards on personal rights and freedoms, and the integrity and dignity of the individual.

CONTRIBUTIONS, SPONSORSHIP AND ASSOCIATIONS

The company can participate in contribution requests for proposals from and/or assisted by regularly established and checked non-profit organisations and associations.

ENVIRONMENTAL PROTECTION

The company commits to spreading and consolidating an internal and external culture on safety, by raising awareness of the risks; furthermore, it works with preventive measures to protect its co-workers' health and safety and to protect the environment in compliance with related national and international directives. It sees sustainable development as a strategic factor of its corporate policy, encouraging good behavioural practices and assessment and definition of possible improvements to its own internal processes in that direction.

FAIR COMPETITION

The company intends to practice fair competition by avoiding anti-competitive, collusive behaviour or abusing one's superior position of power.

PRIVACY PROTECTION AND RESTRICTED INFORMATION

Each recipient must protect the privacy and confidentiality of information concerning the company which they may become aware of while working for the company. In compliance with current legislation, all the information, knowledge and data acquired and processed by the recipients during the course of their work cannot be used, communicated or divulged without express authorisation from the owner company.

Each recipient must:

- only acquire and process information and data which is essential and directly linked to their own work;
- store this data and information in a way that prevents unknown third parties from accessing it;
- communicate and divulge the data/information as part of the procedures pre-established by the owner company and following authorisation from the owner company, through the appointed individual;
- assess and determine the confidential and private nature of the information pursuant to the contents of the procedures pre-established by the company that owns the data;
- comply with privacy obligations even after the relationship with the company that owns the data has terminated, in compliance with current legislation and/or previously agreed contractual commitments.

The Company's work requires data processing - intending this to mean any operation or complex of operations, performed even without the aid of electronic tools, concerning the collection, registration,

organisation, preservation, consultation, elaboration, adjustment, selection, extraction, comparison, use, interconnection, blocking, communication, diffusion, deletion and destruction of the data, even if not recorded in a database - subject to protection under current legislation on matters of privacy. The company is particularly careful about aspects concerning the privacy of staff/co-workers/customers/users and any other individual affected by the processing of their personal data by the company itself. Specific safety measures are observed to prevent the loss, illegal or incorrect use of data subject to processing by the Company and/or unauthorised accesses to the company's website. The processing of personal data is only permitted to authorised staff and in adherence of standards and procedures established in compliance with current legislation.

The company is committed to protecting information and data concerning the recipients and third parties, and to preventing it being used incorrectly in any way.

SANCTIONS

Failure by recipients to comply with the Code of Ethics will result in various sanctions being imposed according to the role covered by the recipient in question, without prejudice to any right to possible damages arising from this failure to comply.

Compliance by the recipients to the Code of Ethics goes hand in hand with the general requirements of loyalty, correctness, working in good faith with one's contract, and also taking into account art. 2014 of the Italian Civil Code (Diligence of the work provider). Violations of the Code of Ethics standards represent a failure to fulfil the obligations arising from the working relationship, with every contractual and legal consequence, including reference to the relevance of these violations as disciplinary offence and/or the keeping one's job. The company commits to plan and implement sanctions in proportion to the seriousness of the violations committed, in compliance with the company's disciplinary procedures and those of the relevant Collective Agreement.

For those working with the company, the sanctions detailed in their contract will be applied for violations of the Code of Ethics.

This Code of Ethics will be periodically re-examined and changes or integrations may be made at any time. Recipients will promptly be informed using the appropriate means of distribution.

The Sole Director pro tempore

