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INTRODUCTION

EP Elevatori Premontati S.r.l. is distinguished by an entrepreneurial style that has made values such as honesty, transparency, social and environmental responsibility and innovation its hallmark since its inception.

Today, it is essential for the Company to clearly reaffirm the set of corporate principles and values in which it has always recognised itself, which it shares and which govern the rights, duties and responsibilities of all those, in various capacities, are bound by a business relationship with the Company.

A fundamental instrument within this process is this 'Code of Ethics', adopted by resolution of the Administrative Body on 13/06/2024

Moreover, the Code of Ethics is a 'safeguard' in addition to other protocols and procedures grouped under the so-called 'organisational and management model', the provisions of which have been drafted in accordance with the Confindustria Guidelines for Construction of Organisational, Management and Control Models pursuant to Legislative Decree 231/2001 and whose Guarantor is the Supervisory Body referred to in the same Model.

1. PRESENTATION OF THE COMPANY

EP Elevatori Premontati S.r.l. was established in 1991 and to this day can be said to be fully A company with over forty years of history and success to its credit.

The company's activities consist of study, organisation, design, construction, marketing, of lift systems in general, also for the disabled.

The main strengths of EP Elevatori Premontati S.r.l. are the use of top quality materials and the ability to customise systems (dimensions, materials, finishes, safety systems and types of manoeuvre) according to customer requirements.

Over the years, the company has moved towards the pursuit of ever-higher quality standards, focusing on improvement and careful planning of operational, production and decision-making processes.

The extreme care for every detail of the commercial offer - design, Made in Italy technical quality, development of high-efficiency solutions and low energy consumption - has made the company a leader in the sector, leading to significant increases in turnover and public recognition.

Precisely in view of its commercial success and, above all, its great potential for growth also at international level, EP Elevatori Premontati has

attracted the interest of the well-known asset management company, Riello Investimenti Partners, which finalised the closing of the acquisition of 75% of the company in 2023.

In addition, EP Elevatori Premontati has been pursuing a Quality and Safety at Work Policy for some time, obtaining ISO9001 certification (quality system for design, production, marketing, installation, after-sales service and maintenance of elevator systems) and international certification for the Occupational Safety and Health Management System with ISO 45001-2018.

Finally, with the aim of identifying the best operating procedures to limit the risk of involvement in offences, the Company has adopted a Management and Control Model pursuant to Legislative Decree 231/2001.

Today, the company, with its registered office in Prato, mainly carries out its design, prototyping and production activities at its production plant located in Vecchiano (PI), in a vast industrial site of about 18,000 square metres, of which 5300 square metres are covered (production plant, offices, showroom and shipping warehouse) and where a workforce of over 100 employees operates.

2. STRUCTURE OF THE CODE OF ETHICS

This Code of Ethics consists of three parts:

- Ethical Principles and Values:

the ethical principles and values to which EP Elevatori Premontati S.r.l. (hereinafter, 'the Company' or 'the Company') adheres and which all those who work within the Company or who, for any reason, have relations with it (id est: Addressees) are called upon to adhere to;

- Standards and Rules Conduct:

the criteria of conduct and the guidelines that must govern the Company's activities are set out and, in particular, the rules of conduct addressed to the Addressees of this Code and that they are called upon to observe, also to prevent the risk of unlawful or simply unethical conduct being committed;

- Implementation, control and monitoring arrangements:

rules describing the procedures for disseminating the Code, as well as those for updating and implementing the principles and rules of conduct contained therein, are identified. The procedures for reporting and handling any violations are also defined.

3. ADDRESSEES, SCOPE AND DISSEMINATION OF THE CODE OF ETHICS

This Code of Ethics applies to EP Elevatori Premontati S.r.l. and the Companies controlled by it. Moreover, this Code is also addressed to the Shareholders and company representatives, as well as collaborators, consultants, suppliers, partners, contractors and sub-contractors and all those, directly or indirectly, permanently or temporarily, in any capacity and regardless of the type of contractual relationship, contribute to the achievement of the company's goals and objectives, and as such are required to comply with the provisions and values contained therein.

For these categories of subjects, therefore, any violation of the provisions of this Code may be identified among the specific causes of automatic termination of the contract pursuant to Article 1456 of the Civil Code or legitimise the termination of existing contractual relations. This Code of Ethics is an integral part of existing and future employment contracts.

Therefore, violation of the provisions contained therein shall constitute a disciplinary offence, sanctioned and prosecuted by the Company in accordance with the provisions of the Law and in compliance with the provisions of Article 7 of Law 300/1970.

The Code of Ethics is valid both in Italy and abroad, even taking into account the cultural, social and economic diversity as well as any necessary adaptations required by the specific legislation of the various countries in which EP Elevatori Premontati S.r.l. operates.

4. ETHICAL PRINCIPLES AND VALUES

In the realisation of its corporate purpose, EP Elevatori Premontati S.r.l. is inspired by the following principles and values that represent an inalienable asset for the Company and must be understood as binding for all the Addressees of this Code:

- 4.1 Ethics in business management;**
- 4.2 Labour Ethics and Protection of Employees**
- 4.3 Responsibility towards the community and environment.**

4.1 ETHICS IN BUSINESS MANAGEMENT

4.1.1 PRINCIPLE OF LEGALITY

The Company recognises as an indispensable principle compliance with the laws and regulations in force in all countries where it operates.

4.1.2 PRINCIPLE OF INTEGRITY, HONESTY, FAIRNESS AND PROFESSIONALISM

In the performance of all business-related activities and in relations with third parties - customers, suppliers and competitors - EP Elevatori Premontati S.r.l.

undertakes to act fairly, honestly, ethically and in accordance with the laws in force. None of the Addressees is authorised to take unfair advantage another person - natural or legal - through manipulation, concealment, illegal use of privileged or confidential information, misrepresentation of essential facts or any other unfair practice.

4.1.3 PRINCIPLE OF TRANSPARENCY

EP Elevatori Premontati S.r.l. undertakes to disseminate to Addressees transparent, complete, accurate and comprehensible information that enables counterparts to establish business or professional relations with the Company in full awareness and to know in a truthful and reliable manner the Company's performance as well as any economic, equity or financial element of the Company.

4.1.4 PRINCIPLE OF CONFIDENTIALITY

Any information that is acquired by the Company's employees and/or collaborators by reason of their role/assignment belongs to EP Elevatori Premontati S.r.l. and constitutes an essential part of the heritage of intangible assets indispensable for the creation of value.

The Company requires a special degree of caution its employees/collaborators when communicating such confidential information and recommends the adoption of all necessary precautions to prevent its unauthorised disclosure and the risk of public dissemination.

The same precautions, in full compliance with the relevant legislation in force (specifically "Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons

with regard to the processing and free movement of such data and repealing the Directive 95/46/EC ('General Data Protection Regulation') (hereinafter 'GDPR'), as well as the coordinating Italian legislation), are required for the processing of personal data of employees, customers, suppliers or third parties, which are provided or communicated to the Company in the course of its activities.

4.1.5 PRINCIPLE OF DIGNITY AND EQUAL OPPORTUNITIES

EP Elevatori Premontati S.r.l., in line with its own ethical vision, supports and promotes the value of the person through respect for the physical, cultural, moral and sexual integrity of individuals whose personal safety and freedom it also . Therefore, it repudiates any discriminatory activity or attitude that may lead to injury individual safety and dignity as well as any possible exploitation or reduction to a state of subjection of the person, especially if minor.

Therefore, in carrying out of business activities, the Company makes impartial decisions in full respect the principles of dignity and equal opportunities.

4.1.6 PRINCIPLE OF EQUALITY AND PROHIBITION OF EXPLOITATION

EP Elevatori Premontati S.r.l. guarantees and promotes working conditions that respect the dignity of the worker.

The company recognises the freedom of association of workers, including those of a nature

trade union or political, and the right to collective bargaining.

EP Elevatori Premontati S.r.l. undertakes not to make use, even indirectly, of either forced and compulsory labour or child labour and to comply with current national regulations on working hours and equal pay for men and women.

EP Elevatori Premontati S.r.l. does not tolerate sexual harassment and physical or psychological harassment, in whatever form or context they occur.

4.2 WORK ETHICS AND EMPLOYEE PROTECTION

4.2.1 SAFETY, HEALTH PROTECTION AND WORK

EP Elevatori Premontati S.r.l. protects the psychophysical integrity of its employees and collaborators and, in this perspective, promotes comfortable and safe working conditions and environments, in compliance with the regulations in force. Also in order to provide its Collaborators with the best professional and safety skills, EP Elevatori Premontati S.r.l. undertakes to periodically offer refresher and training courses.

4.2.2. LOYALTY AND ABSENCE OF CONFLICT OF INTEREST

EP Elevatori Premontati S.r.l. requires its Collaborators to avoid any situation of conflict interest between personal or family economic activities and the position held in the Company that could independence of choice and judgement and that, therefore, any decision is taken in the sole interest of the Company and/or in concert with it.

4.2.3 RIGHT TO REPORT

EP Elevatori Premontati S.r.l. guarantees each Collaborator who has become aware of facts, conducts and attitudes contrary to the principles and values contained in the Code of Ethics, the right to report, confidentially and also anonymously, according to the modalities better outlined in the Whistleblowing Policy.

4.2.4 RESPONSIBILITY TOWARDS THE COMMUNITY

EP Elevatori Premontati S.r.l. carries out its activities in full compliance with the environment, the territory and the needs of the community in which it operates. With this in mind, the Company scrupulously observes national and EU legislation on environmental and safety issues and carries out its business development always using the best available technologies, aiming to pursue the environmental sustainability of its products, selecting suppliers that use production techniques that respect environment and with the least possible impact in terms of pollution and resource exploitation

5. STANDARDS AND RULES OF CONDUCT

Without prejudice to the Principles of Ethics set out in Part I, a number of rules are set out below, which are intended to indicate the conduct that must be maintained in the performance of relations pertaining to the various corporate activities.

5.1 RELATIONS WITH STAKEHOLDERS

The Company manages relations with Stakeholders, including company representatives, senior management and external parties (consultants, agents, representatives, intermediaries, etc.) in full compliance with current legislation, the principles of this Code, internal regulations and protocols, as well as those laid down in the Management and Control Model pursuant to Legislative Decree 231/2001, and conducts itself with loyalty, honesty, fairness and transparency. The Company, taking into account available information, refrains engaging in relations, direct or indirect, with persons of whom it is known, or even merely suspected involvement in unlawful activities (also in relation to the manner of employment or exploitation of workers).

5.2 RELATIONS WITH CUSTOMERS AND SUPPLIERS

EP Elevatori Premontati S.r.l. approaches its customers and suppliers with professionalism, fairness and transparency, in compliance with all applicable Laws and all internal Company protocols.

The Company, when engaged in production activities, committed to providing products with high standards of quality and safety and responding to customer demands, also through a rigorous selection process of suppliers of raw materials and services.

5.3 RELATIONS WITH THE PUBLIC ADMINISTRATION

The management of relations between the Company and the Public Administrations is reserved exclusively to the competent Functions and authorised personnel and must take place in strict compliance with the provisions of the Law and the Procedures laid down in the Model.

The Company diligently keeps the documentation relating to the procedures involving the Public Administration and takes care to verify, through the persons in charge, the correct use of the public funds of which it has been the beneficiary for any reason.

Any gifts to public bodies will be provided in accordance with the regulations in force. In relation to relations with the Supervisory Authorities, the Company guarantees the completeness, integrity and truthfulness of the information provided.

5.4 RELATIONS WITH POLITICAL AND TRADE UNION ORGANISATIONS

EP Elevatori Premontati S.r.l. respects and supports freedom of association in line with collective bargaining.

5.5 RELATIONS WITH EMPLOYEES

EP Elevatori Premontati S.r.l. requires its employees and collaborators to perform their duties with professionalism and dedication and to scrupulously observe the provisions of this Code of Ethics.

Work shall be carried out with diligence and with absolute respect for colleagues and company property; personnel shall take the utmost care of their person and maintain an attitude of seriousness and decorum.

It is essential that staff and collaborators take care of the environments in which they carry out their activities (offices, shops, exhibition spaces, warehouses) and, more generally, of everything that may be considered as Company assets, including warehouse goods, computer systems, equipment and furnishings.

5.6 MEDIA RELATIONS

Relations with the press and other mass media are reserved for the relevant corporate bodies and functions as well as external collaborators (individuals/Agencies/Companies) to whom the Company delegates the management of such activity.

The promotion of the Company respects the ethical values set out in this Code, repudiating the use of vulgar or offensive messages.

The Company, through its appointed functions and collaborators, verifies and checks that the information published on the institutional website is correct, truthful and compliant with the ethical principles set out in this Code.

6. IMPLEMENTATION, CONTROL AND MONITORING ARRANGEMENTS

6.1 SUPERVISORY BODY AND CODE OF ETHICS

control and training activities in relation to this Code of Ethics are entrusted to the Supervisory Board, appointed pursuant Articles 6 and 7 of Legislative Decree 231/01, which shall monitor compliance with it; urge any updates to it; promote its dissemination and report to the competent corporate bodies its observations on alleged violations of the Code of Ethics of which it becomes aware.

6.2 DISSEMINATION, REPORTS AND SANCTIONS

The Code of Ethics and its updates must be brought to the attention of all Addressees through appropriate dissemination activities.

To this end, the Code of Ethics is: published on the institutional websites of the company brands; a hard copy is posted on the company notice boards and, when signing the employment contract, every employee is required to read it.

In particular, any violation of the principles and provisions contained in this Code of Ethics must be promptly reported by the Addressees to the Supervisory Board as specified in the following paragraph (Whistleblowing).

On the other hand, as regards the sanctions system, please refer to the provisions of the Management Model for the different categories of Addressees.

6.3 WHISTLEBLOWING

The Addressees of this Code are obliged to report any violations of the principles and provisions contained herein, and failure to do so is expressly sanctioned.

In the event of any knowledge of any irregular conduct or violation of this Code of Ethics, whether active or omissive, committed or attempted, employees who come to their knowledge shall refrain from personally conducting any investigation and report it promptly to the Supervisory Board.

odv231@epelevators.com Reports to the Supervisory Board may be made by to the dedicated address or by letter sent to the Company's registered office or by written letter to be placed in the special letterbox for reports to the Supervisory Board.

Pursuant and for the purposes of Article 6 of Legislative Decree 231/2001, as amended by Article 2 of Law 179/2017, the confidentiality of the identity of the person making the report will be guaranteed and any act of retaliation or discrimination against the person making the report for reasons directly or indirectly related to the report will be prohibited.

