

Code of Ethics

SCAME Group



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Letter from the Chairman

The Code of Ethics contains the values that should guide our daily work and represents a guide for all of us toward developing the ability to define and respect behaviours that support the sustainable growth of the Group.

This document represents the fifth edition of the SCAME Group's Code of Ethics and integrates the experience that the SCAME Group is gaining in managing the complexity of the issues that the Code of Ethics must and wants to regulate.

The historical and economic context we are living is extremely difficult from several points of view-geopolitical, economic, social-but I am convinced that we will overcome it with strength also thanks to our respect for the People with whom we collaborate, the Environment in which we operate and the Communities that host us.

My invitation is for you to take the time to read this Code so that it can continue to be a foundation on which to build a sustainable present and future for the SCAME Group.

*Chairman of SCAME S.R.L.
Gianfranco Andreoletti*

1. Introduction

1.1 Foreword

Nowadays the Company must answer for its behaviour to the various Stakeholders to which it is bound not only in terms of economic results, creation of employment, quality of its productions and compliance with current regulations, but increasingly also in terms of defence of human rights and safety in its departments, respect for the environment and social support and commitment in the area in which it operates.

The **SCAME Code of Ethics** is the **official document** which, addressing to all the Stakeholders with whom the Company interacts in conducting its business, indicates the values that the Group, through the behaviours of its Associates, commits to respect and which pilot the identification and detection of the regulatory provisions that it wants- and / or it must honour in order to support a sustainable growth and protect corporate reputation.

This Code is not intended to replace any legislative, regulatory or organizational provision required by the laws applicable in the countries in which the Group operates and by the policies, procedures and / or organizational provisions envisaged by SCAME, but aims to supplement the latter by generating and managing an activity of prevention and supervision of violations that may occur.

1.2 Definitions

For a better understanding of the contents of the Code of Ethics, the definitions of the terminology used in this document are collected below:

Associate

Any person who works for or in the interest of SCAME. Associates also include external consultants with ongoing and daily relationships with the Company.

Circular Economy

Economic system that aims to minimize the use of virgin materials, pollution and waste, through a production and consumption model based on sharing, reuse, loan, repair, reconditioning and recycling and on the use of products and materials as long as possible.

Code

This edition of the SCAME Code of Ethics.

Company

The set of people and assets that form the Companies of the Group.

Competitor

Person or company outside the perimeter of the Group that operates in the same market as the SCAME Group Companies.

Customers

Those who purchase goods or services from Group Companies.

Direct Manager

The direct supervisor who each resource refers to in daily operations and from whom receives operational indications.

Employee

Worker who carries out tasks on behalf of one of the SCAME Group Companies.

ESG

Environmental, Social, Governance - three dimensions of environmental, social and governance sustainability.

Ethics Committee

Internal unit with autonomous powers of initiative and control with supervisory tasks on the adequacy, functioning and compliance of this Code of Ethics. It also has the right to propose changes and / or additions to the Code to the Shareholders' Meeting of SCAME S.R.L..

General Management

Chairman of the Board of Directors and Chief Executive Officer of SCAME S.R.L..

Group Companies

The Companies in the following list:

1	LuDo-fin SRL
2	C.O.S.P.A. di Andreoletti SRL
3	Scame SRL
4	Scame Mastaf SpA
5	Scame Tatra AS
6	Natalia MM LTD
7	Scame Bulgaria EOOD
8	UC AlbinoLefte S.R.L.

Human Resources Department

The set of people in SCAME Group who are responsible for the recruitment, placement, management and development of Personnel.

Members of the Board of Directors

Members of the Board of Directors of the SCAME Group Companies: Chairman, Chief Executive Officer, Directors.

Responsible

Person who holds a supervisory role and is directly responsible for the management of one or more Employees in SCAME.

Safety Manager

Person with professional skills and hierarchical and functional powers appropriate to the nature of the assignment conferred on him / her, who implements the directives of the employer by organizing the work activity and supervising it.

Safety Officer

Person with professional skills and within the limits of hierarchical and functional powers, appropriate to the nature of the assignment conferred on him / her, who supervises the work activity and guarantees the implementation of the directives received, checking their correct execution by the workers and exercising a functional power of initiative.

SCAME Group

All the Companies listed in the definition of Group Companies.

Shareholder

Person or entity that holds a share in the SCAME Group.

Shareholders' Meeting

Shareholders' Meeting of SCAME S.R.L., a body that elaborates and approves the principles of this SCAME Code of Ethics.

Stakeholder

Each of the parties involved or with an interest in SCAME: Employee, Investor, Shareholder, Customer, Supplier, Community, etc.

Suppliers

Those who supply goods or services to Group Companies.

Third parties

Agents, Intermediaries, Partners, Employees, Consultants (both natural and legal persons), Clients, Suppliers and other representatives who carry out work on behalf of and / or for the companies of the SCAME Group.

Workplace / work environment / working atmosphere

The physical location and all colleagues where Associates carry out their daily activities and where they go for meetings, calls and business trips.

1.3 Recipients

The SCAME Code of Ethics is intended for Shareholders, Members of the Board of Directors the Board of Statutory Auditors, other established corporate Bodies, all Employees directly or indirectly employed by the subsidiaries and associated Companies of the SCAME Group and all the external Associates and Third Parties who carry out activities with and on behalf of SCAME, in all the countries in which it operates.

The SCAME Code of Ethics applies to all Group Companies except U.C. AlbinoLeffe S.R.L., which has its own Code of Ethics approved on 28/09/2018 for reasons related to the specific nature of its activity.

Each recipient of this Code, in addition to being personally required to comply with the provisions of the same, is subject to the responsibility for verifying compliance with the same principles by his or her Collaborators in consideration of his or her own role within the corporate structure.

If a recipient believes that the application of the principles set out in this Code of Ethics is not respected, he / she is required to report it in the modality indicated in paragraph '5.3 Unlawful reporting', so that this can be assessed by the competent bodies.

1.4 Scope of application

Compliance with the Code as well as with Company rules and procedures constitutes precise contractual obligation with any consequent sanctioning provision in the event of violation of the same based on the applicable national regulations.

The principles and contents of the SCAME Code of Ethics configure obligations of diligence, loyalty, impartiality for all recipients of the same and as such constitute essential elements of the correct fulfilment of the work or professional performance, resulting in responsible behaviours towards each Company of the Group.

Their violation compromises the relationship of trust between SCAME and the transgressor and constitutes a breach of contract.

In the event of a discrepancy between the provisions contained in this Code of Ethics and in the regulations or internal procedures, the provisions of the Code are to be considered prevailing.

2. The Group's values

The SCAME Group wants to characterize itself for the ability to create value for its own Shareholders by giving qualified answers to its Customers and for a correct and gratifying relationship with its Associates and all the other Stakeholders, using optimized systems and processes that guarantee a management careful of worker safety and of its environmental impacts.

2.1 Ethics

Honesty, fairness and respect for the parties.

Ethics may be defined as the set of moral and behavioural norms of an individual or group with reference to particular situations.

With reference to a Company may be considered "ethical" any behaviour that is in line with corporate principles and values that integrate to the economic objective aspects of healthy and fair competition, creation and maintenance of a constructive and respectful relationship with internal and external interlocutors of the Company, therefore excluding opportunistic and market-damaging behaviours.

For the SCAME Group, ethics has a primary value as a tool that guides the behaviour of corporate bodies, management, internal and external Personnel beyond Company rules and procedures.

The Personnel of the SCAME Group, both when acting individually and at collective level, is called to act with honesty and seriousness and to always respect the laws in force in the countries in which they carry out their activities, as well as behave respectfully of thoughts and states of others.

2.2 Relationship with Shareholders

SCAME is committed to increasing its value, taking care of its economic performance so that the amount invested by the Shareholders can be profitable and believes that the relationship with its Shareholders must be characterized not only by compliance with the law, but also by the constancy, correctness and transparency of the transmitted information in order to ensure the best understanding of the activities carried out, the economic trend and of the financial solidity of the Company and of the Group.

2.3 Customer satisfaction and protection

Ability to serve, seriousness, respect for commitments and for people, quality, competitiveness.

The Company carries out an activity of sub-supply of moulded components in thermoplastic material made on the basis of inputs received from Customers and it wants to qualify itself for the ability to be a serious and competitive partner that guarantees the quality of its supplies and support in the design of details and necessary equipment.

The history of the SCAME Group is full of successful relationships in this sense and our daily effort is to make the Customer consider us not just a Supplier but a serious and capable Partner with whom to build a long-lasting relationship.

This ambition must guide the daily work of all of us.

2.4 Economic and financial balance

Accounts in order!

The management of the Group aims to create value in compliance with what is due to all the Stakeholders with whom it comes into contact while maintaining solid economic and financial bases, which are the prerequisite for a sustainable growth projected in the long term.

2.5 Respect for human rights

In the relationship with all Stakeholders, the SCAME Group undertakes to respect Human Rights as established in the Universal Declaration of Human Rights (UDHR) adopted by the UN on 10/12/1948 and in the United Nations Guiding Principles on Business and Human Rights adopted on 16/06/2011. The practical implementation of these principles by our Companies must take place according to the procedures established by the Accredited International Bodies.

2.6 Respect and enhancement of Personnel

People are our most valuable resource.

a) Training

The Company's task is to train its staff through internal training programs that recognize meritocracy and to make the staff to operate in a context that stimulates active participation in technical / managerial issues to increase the wealth of experience that will always improve their skills.

b) Respect for diversity

The fight against discrimination, the promotion of diversity and equal opportunities are values that must permeate our work in SCAME.

Diversity may be reflected in the difference in gender, age, origin, culture, sexual orientation, nationality, religion, opinions and beliefs, disability, family situation, education and trade union membership.

Under no circumstances may the above differences influence recruitment, training, management and career development decisions.

c) Positive working conditions and work-life balance

Work-life balance is a strength for creating an optimal work environment.

The Company recognizes that the promotion of coherent actions and behaviours at all levels of the Company organization is the basis for building a corporate culture that is oriented towards the balance between work and private life.

2.7 Health and safety at work

Protecting Health and Safety at Work represents a moral responsibility towards those who work with us and no activity is so important that we can neglect that its execution is carried out in absolute safety and any injury is unacceptable to us.

The Company undertakes to implement a management system that provides safe and healthy working conditions through risk analysis, regulatory compliance, accident prevention, training, consultation and participation of all Associates in order to promote behaviours useful to consolidate awareness on the issue of health and safety in the workplace.

All Associates are constantly reminded to comply with the rules and procedures drawn up for the protection of their own safety and that of colleagues, such as the use of personal protective equipment and the need to report promptly to their Safety Manager and / or Safety Officer for any anomaly found.

2.8 Respect for the environment

To protect future generations.

The environment is a primary resource and SCAME is committed to protect it, considering this a duty to preserve the rights of future generations.

SCAME's commitment is realized in compliance with specific legal regulations and with initiatives such as:

- the production of energy from photovoltaic sources;
- the adoption of condensing generators equipped with systems for recovering the heat produced by combustion and able to reduce emissions of nitrogen oxides and carbon monoxide into the atmosphere;
- heat exchange with groundwater for the air conditioning of rooms and departments by means of heat pumps with low temperature fluid powered by a photovoltaic source;
- the reduction of water consumption by collecting groundwater for industrial use;
- the reuse of production waste;
- monitoring of waste and its separation to promote recycling or reuse where possible;
- precise control of emissions;
- the formulation of a sheet with safety and non-pollution requirements that the materials used must satisfy in order to be used.

Moreover, in collaboration with our Customers, we try to apply the criteria of Circular Economy in our production processes through, for example, the reuse of recycled materials.

2.9 Biodiversity

SCAME is committed, both in its own activities as well as in the case of new or expansion of existing activities, to take the necessary measures to ensure that the variety of living organisms in its various forms and in their respective ecosystems is preserved.

2.10 Social responsibility

We must be responsible for the society and the territory in which we work.

SCAME recognizes the social role that the Company plays within the territory and has committed itself, in practice, to support initiatives that it deems useful for the growth of the youth in the territory.

3. General rules of conduct

The SCAME Group inspires its choices and general rules of conduct according to the principles expressed in the following chapters of this Code of Ethics.

3.1 Compliance with the Code of Ethics and Company Procedures

The Personnel of the Group must act in compliance with the principles established by this Code of Ethics and by the Company Procedures. Behaviours or actions that do not comply with the guidelines set out in this Code or in the Company Procedures are not allowed.

Each Associate can propose changes or additions to this Code which will be evaluated by the Ethics Committee and which can be sent by email to the address comitato.etico@scame.it.

3.2 Legitimacy

SCAME has as essential principle the observance of the laws in force in the countries in which it operates and believes that lawful conduct is the prerequisite for civil life and constitutes the basis of a lasting relationship with Associates, Customers, Suppliers, Public Administration and Third Parties.

Each Associate, within the scope of his or her competences, is required to know and comply with the laws in force in all the countries in which the Company operates.

It is responsibility of each Associate to request assistance from the Direct Manager in case of doubt to verify the compliance of his / her actions with the regulations.

3.3 Transparency

SCAME believes that transparency is an important aspect in every area of its business activities, for this reason it ensures the truthfulness of what has been communicated in various ways.

Anyone who, based on his role in the Company, has the authorization to speak on behalf of the Company must provide accurate and truthful information and must clearly expose them to avoid misunderstandings about the content shared.

3.4 Conflicts of interests

As part of their activities, Group Personnel must avoid being in situations or personal activities outside the context of the Group Companies that may be in conflict with the Group's corporate interests.

In this sense, Group Personnel:

- cannot carry out work activities in favour of competitors or perform, without prior consent of the Company he / she works for, as Employee, Consultant, Member of the Board of Directors or of the Board of Statutory Auditors, his / her professional and working activities in favour of companies that are directly or indirectly competitors of the Company he / she works for;
- cannot represent, act and work on behalf of a Supplier or Customer of the Company he / she works for without being previously authorized by the General Management.

The Personnel cannot have economic and / or financial interests of any title in the activities of Customers, Suppliers or Competitors.

Group Personnel is required to promptly notify the Company of any situation that could constitute a potential conflict of interest, even if this relates to their own family unit.

3.5 Anti-corruption

In the context of daily employment relationships, all those involved in SCAME's activities are required to behave transparently and in good faith, avoiding conducts that can be interpreted in any way as corruption.

The Group condemns any conduct consisting in giving or promising money or other benefits (including objects, services, performances, favours) to public or private subjects, Italian or foreign, with the aim, directly or indirectly, of obtaining an unfair advantage for oneself, for the Company he or she works for or for other Group Companies. Such behaviours are considered acts of corruption.

As an exception, commercial courtesy acts of modest value and which cannot be interpreted in any way as corruptive behaviours are allowed. In any case, these acts must be adequately documented and authorized, following the indications of the General Management.

It is forbidden to give or promise money or other goods or grant other benefits to public officials or persons in charge of a public service, not even under unlawful pressure.

It is also forbidden to induce public officials or people in charge of public service to use their influence on other subjects belonging to the Public Administration.

Furthermore, in the context of relations with the Public Administration, the Companies of the Group may not be represented by people who may find themselves in any situation of conflict of interest.

Group Personnel who receives requests or offers of money or other benefits from private or public entities must refuse it and promptly report the fact to the Direct Manager who must promptly inform the General Management.

3.6 Fair Competition

The Group relates to Competitors by adopting principles of full legality and fairness with a view to competitiveness on the market.

Commercial policy must develop in compliance with current legislation and conduct aimed at disturbing free competition is prohibited.

The Group Personnel is required, even in the event of termination of the employment relationship, not to disclose information regarding the technical, technological and commercial knowledge of the Group Companies, as well as other non-public data and / or news relating to the Companies.

3.7 Anti-Money Laundering

The Group is committed to complying with all applicable regulations regarding the prevention of money laundering and/or the financing of illegal activities, by adopting a system of internal documentary controls based on the exclusive use of official banking channels and traceable documentation, aimed at promptly identifying any suspicious behaviour or activities. It is, in fact, prohibited to carry out or facilitate any transaction that may, even potentially, facilitate the transfer of assets derived from illegal activities.

In this regard, SCAME operates with the complete transparency, tracking all financial flows and ensuring that every transaction is properly authorised, documented and consistent with the company's activities and objectives.

3.8 Anti-fraud

SCAME prohibits any form of fraud, whether internal or external. In particular, it is prohibited to engage in fraudulent conduct, such as document forgery, accounting manipulation, or the misappropriation of company assets, funds or other resources.

The Company implements internal control measures to prevent and detect irregularities, ensuring that all those subject to the Code act with integrity and report any suspicious or anomalous behaviour.

In particular, the internal control system operates on several levels, such as:

- Initial checks by the Accounting Manager, with the support of their staff, on the accounting entries to be made based on the documentation received;
- Verification by the Finance Manager of the consistency between accounting entries, official documents and actual financial transactions;
- Final analysis by the Administrative Manager, aimed at identifying any fluctuations and/or anomalies in the accounts not justified by adequate documentation, through periodic checks and monthly financial statements reports.

In addition to these controls, the Board of Statutory Auditors carries out further checks on the adequacy and effectiveness of the internal control system, as well as on the correctness of administrative and accounting procedures.

4. Relationship with Stakeholders

SCAME, in carrying out its daily activities, has contacts with the entities indicated below and hereby intends to outline the guidelines that must characterize these relationships.

4.1 Personnel

The SCAME Group:

- declares to comply with all national labour laws, collective agreements and health and safety regulations, as well as internationally recognized legislation in all the markets in which SCAME carries out its activities;
- reaffirms its commitment to respect the United Nations guidelines on Human Rights;
- undertakes to respect the fundamental provisions of the International Labour Organization (ILO) Declaration on fundamental principles and rights at work;
- recognizes the centrality of the Person basing the relationship with Associates on the principles of correctness, legality and compliance with the relevant National Collective Bargaining Agreements and reaffirms its commitment to guarantee correct working conditions in all Group Companies;
- recognizes, protects and doesn't hinder the right of Employees to join trade union and political associations;
- promotes merit and equal opportunities, rejecting any type of discrimination based on sex, racial and ethnic origin, nationality, age, political opinions, religious beliefs, state of health, sexual orientation and family and economic / social conditions;
- carries out recruitment and hiring of Personnel based on the correspondence of the profiles to the needs, according to criteria of equal opportunity and mutual transparency between the candidate and the Company;
- undertakes to invest in growth, training and satisfaction of Personnel, in order to increase their skills and enhance their wealth of knowledge;
- requires that no harassment is given in employment relationships, or all those actions that intend to isolate, discriminate or offend through hostile and intimidating attitudes individual or groups of Associates; this includes sexual harassment, or imposition of interpersonal relationships despite the express dislike of the other party;
- rejects any form of child or forced labour.

SCAME also requests that the following principles characterize the work of all Associates:

a) Honesty

The Group Personnel, including the Executives and the members of the Board of Directors of the various Group Companies, undertakes to act in their working activities in compliance, without any derogation, with the law, regulations, Company procedures and the indications contained in this Code of Ethics regarding the values and ethical principles here specified.

The top management, Managers and Heads of Division must constitute a reference model for all Associates, through an impeccable conduct in the activities of competence, constantly promoting the spirit of collaboration, trust and mutual respect in order to protect and improve the corporate climate, the image and prestige of the Group.

b) Respect for Company assets

Each Associate is required to work carefully to protect Company assets through correct and responsible behaviour in line with Company procedures.

Each Associate must keep in mind that telephone, electronic mail and Internet access and Intranet systems belong to the Company and that:

- their use in the Company must be for legitimate professional purposes;
- all information managed in the computer system belong to the Company;
- it is responsibility of each Associate to keep all passwords and identification codes confidential to prevent unauthorized access to Company data and information;
- only software programs that have been purchased and / or developed by the Company should be used on Company computers;
- the reproduction or duplication of software programs is strictly prohibited.

Each Associate is also required to use the telecommunication systems correctly, namely:

- to scrupulously adopt the provisions of corporate security policies in order to not compromise the functionality and protection of the IT systems;
- not to send threatening and insulting e-mail and not to use low-level language in written or verbal communication and not to make inappropriate comments that may offend the person and / or damage the corporate image;

- not to send e-mail that could bind the Company to Third parties without having the right to do so;
- take the maximum care in the custody of assigned or supplied mobile devices and not transfer them to third parties.

Each Associate is required to defend the confidentiality of Company information, has the obligation of confidentiality and is required to:

- refrain from disclosing any information regarding the Group Companies that is not of public domain;
- always take all necessary precautions to prevent the disclosure of confidential information;
- treat confidential issues with the maximum discretion.

Associates undertake to assume the responsibilities relating to the tasks entrusted and to act cooperatively throughout the period of their stay in the Company.

c) Respect for duties and working hours

In defining and managing working hours and shifts, each Associate must respect what has been assigned and shared and promptly report the absence or reduction of working hours based on what established in the employment contract.

d) Respect for the right to health

It is forbidden for Associates to possess, consume, offer or deal drugs, alcohol or other substances with similar negative effects while working or while in the work premises.

Smoking is allowed in the workplace only in dedicated areas.

4.2 Associates, consultants and partners

The Group requires its Associates, Consultants, Partners and, in general, those who collaborate with Group Companies, to respect ethical and regulatory principles.

For this reason, the Code of Ethics is brought to the attention of each of them at the beginning of the employment relationship and adherence to the Code is a necessary condition for the start and continuation of the employment relationship.

4.3 Customers

The Group constantly works to meet the expectations of Customers and ensure the continuity of commercial relationships.

The Companies of the Group aim to offer their Customers an appropriate and quality level of services and plastic components in compliance with the laws and the regulations on fair competition as well as on the Health and Safety of the components sold.

The Group deals with Customers according to the principles of correctness and diligence, following the contractual specifications with the goal to achieve and maintain solid and lasting commercial relationships projected over time.

In the contractual relationship with the Customers, the Company demands compliance with the agreed conditions and adheres to them. It is forbidden to perform services for Customers without an adequate contractual relationship.

4.4 Suppliers

SCAME interacts with its Suppliers in order to create serious and lasting business relationships following the principles of correctness, loyalty and transparency.

The principles underlying the choice and the relationship with Suppliers are established in this Code and in the SCAME Code of Conduct for Suppliers.

The choice of Suppliers follows a selection process that aims to verify their commercial and professional reliability, the ability to provide adequate goods and services, the compliance with current regulations, with particular attention to compliance with legislation relating to the protection of health and safety in the workplace and of the environment.

In selecting Suppliers, the Group uses objective and verifiable criteria aimed at protecting the interest and reputation of the Group Companies. The criteria of competitive advantage, equal opportunities, economic conditions, quality, environmental and social sustainability of the products and the services offered constitute points of attention during the selection phase.

In the contractual relationship with the Suppliers, the Group demands compliance with the agreed conditions and complies with them; in fact, it is forbidden to ask for or perform services to Suppliers without an adequate contractual relationship.

4.5 Relations between Group companies

Each SCAME Group Company acts in the management of relationships and in any provision of service between Group Companies in compliance with the principles of integrity, transparency and professionalism.

Each intragroup service provision must be regulated in writing, signed by the Responsible involved in the operation, and with an execution aligned with what is defined in the corporate procedures of the Companies involved.

4.6 Public Administration

The Group deals with the Public Administration following the most rigid principles of legality, fairness and transparency, in full compliance with the principles of impartiality of the Public Administration.

In order to guarantee the most complete traceability, the Personnel in charge must keep all the documentation relating to meetings and contacts with officials and representatives of Public Administration (minutes issued, official communications, via @mail and certified email).

4.7 Auditors and Statutory Auditors

The Group guarantees that all relations with Auditors and Statutory Auditors are based on the utmost professionalism, diligence, transparency, collaboration and availability.

The Group acts in compliance with the institutional role of these subjects and guarantees the execution of the requirements and fulfilments requested, releasing the necessary information in a clear, timely and exhaustive manner.

In the context of relations with the Auditors and Statutory Auditors, the Group avoids any situation of conflict of interest. It also acts to avoid assignments other than their institutional functions, positions that could compromise the independence and objectivity of these bodies.

4.8 Trade Unions, Associations and Political Parties

The Group does not support or discriminate, either directly or indirectly, any political or trade union organization.

Relations with political and trade union organizations are reserved for authorized corporate functions, which manage relations according to principles of transparency and fairness.

The Group Companies do not admit any disbursement of contributions to trade union organizations, political parties and their representatives except when expressly required and permitted by the law and, in the latter case, authorized by the competent corporate bodies or the Board of Directors of the respective Company of the Group.

4.9 Personal data and confidentiality of information

The Group is committed to carefully comply with the legislation applicable to the processing of personal data by preparing the tools prescribed by law. The use of personal data for purposes other than those envisaged is prohibited.

The Personnel undertakes to maintain total confidentiality on any information, data or document known in the exercise of the activity and not to disclose it in any way, except in accordance with company procedures.

Customers, Suppliers and Associates are also required to ensure the confidentiality, with reference to information, documents and personal data, relating to the Group Companies and to the internal and external Personnel who works there.

Information concerning Group Companies and directed to the media may only be disclosed by the corporate functions delegated, subject to specific authorization by the General Management.

4.10 Preparation of accounting documents

In preparing the documents and the accounting data or in the corporate communications required by law, addressed to Shareholders and to the public, as well as in any registration relating to the administration, the internal and external Personnel must comply with the most rigorous principles of transparency, correctness and truthfulness.

Each accounting registration must reflect exactly what is written in the supporting documentation, as this must be complete and subject to verification.

5. Methods of application of the Code of Ethics

5.1 Disclosure of the Code of Ethics

For the purpose of the diffusion of the SCAME Code of Ethics all Group Employees receive a copy of the current SCAME Code of Ethics and demonstrate that they have taken note of the indications on the principles and ethical values that inspire the Group by signing the certificate of delivery.

For employees hired the Group before the Code was adopted, the document can still be consulted at any time by accessing the "Communicate" section of their employee portal.

The Code of Ethics is also posted on the Company notice boards and is available on the Company website at the link www.scame.it.

A specific training program on the contents of this Code is envisaged for new hires.

Compliance with the Code as well as with Company rules and procedures constitute precise contractual obligations with any consequent sanctioning provision in the event of violation of the same based on the applicable national regulations.

5.2 Ethics Committee

In 2021, the SCAME Group established an Ethics Committee, an internal body responsible for overseeing the application of and compliance with the principles set out in this Code of Ethics, as well as for reports of violation of the document.

The appointment and any revocation of Committee members is the sole responsibility of the Board of Directors of SCAME S.R.L. In order to ensure continuity in the performance of the Ethics Committee's functions, there is no fixed term of office for Committee members, who remain in office until they are removed or resign voluntarily.

The Ethics Committee operates in accordance with the principles of independence and autonomy; indeed, participation in this Committee is entirely on a voluntary basis.

The Ethics Committee is also responsible for reviewing proposals to update the SCAME Code of Ethics and proactively promotes its implementation, taking into account feedback from the recipients of the SCAME Code of Ethics.

Proposals to amend the Code of Ethics are submitted by the Ethics Committee to the Shareholders' Meeting of SCAME S.R.L., which is responsible for defining and approving their content.

5.3 Control and supervision system

The Group will assign the task of supervising the observance of the SCAME Code of Ethics to a specifically Ethics Committee ruled in the paragraph 5.2 above.

The Ethics Committee, in the exercise of its functions, will have free access to Company data and information that may be useful to carry out its activities, guaranteeing in any case compliance with the confidentiality standards required by law.

The corporate bodies and their members, the Employees, the Consultants, the internal and external staff who act on behalf of the Group are required to provide the utmost cooperation in favouring the control activities by the Ethics Committee.

Each SCAME Group Company, depending on the specific activity carried out and the geographical location in which it operates, has the right to define its own Ethics Committee. The relationship between the Ethics Committees of the various SCAME Companies will be of full cooperation and transparency in order to ensure that the control and supervision of compliance with the ethical principles defined by this Code is consistent in all Group Companies.

5.4 Unlawful reporting

Each corporate function is required to report to the Ethics Committee in detail any illegal conduct or violation of this Code of Ethics of which it becomes aware due to the functions performed.

Reports must be done sending a communication through one of the following channels:

- by e-mail to the address comitato.etico@scame.it;
- by ordinary mail addressing it to the ETHICS COMMITTEE, c / o Scame S.R.L., Via Einstein, 7 - 24040 - Suisio (Bg) - ITALY;
- by filling in the Whistleblowing questionnaire at the link www.scame.it, "Contacts" section, a system that guarantees the anonymity of the whistle-blower.

The Ethics Committee evaluates all the reports received and takes the consequent initiatives at its own discretion and responsibility within the scope of its competences, reserving the right to listen the author of the report and the person responsible for the alleged violation.

Members of the Ethics Committee receive an annual update on the functionality of the reporting platform to ensure the proper and timely handling of reports.

All reports received through the channels listed above are recorded in a dedicated register, which is updated monthly by the ESG Referent of SCAME Group to ensure traceability and monitor the status of the report.

The Group undertakes not to adopt any type of retaliation or discrimination against the whistle-blower, committing itself to protect him / her, guaranteeing him / her the confidentiality standards required by law.

Any subsequent decision will be reasoned, and any measures will be applied in accordance with the provisions of the chapter of this Code concerning the sanctioning system.

5.5 Sanctioning system

The application of the SCAME Code of Ethics is protected by a sanctioning system through the bodies and functions in charge that ensure, with coherence, impartiality and uniformity, sanctions proportionate to the violations and in compliance with the provisions in force on employment relationships.

The sanctioning procedure envisages that, following the communication by the Ethics Committee of the violation of the SCAME Code of Ethics, an assessment procedure is initiated in compliance with the provisions of the National Collective Bargaining Agreement of the Employee. This assessment procedure is conducted by the corporate bodies responsible for disciplinary sanctions, considering the seriousness of the behaviour and the presence of any recidivism, lack or degree of fault.

Disciplinary sanctions comply with the applicable national laws and in any case do not prejudice the possible adoption of different sanctions, including criminal ones, connected to responsibilities of another nature.

Any form of retaliation against those who have reported possible violations or requests for clarification on its application methods also constitutes a violation of the SCAME Code of Ethics.

5.6 Update of the Code of Ethics

This document constitutes the fourth edition of the SCAME Code of Ethics, approved by the Shareholders' Meeting of SCAME S.R.L. on 23/06/2026.

The SCAME Code of Ethics is also available in Italian, Slovak and Bulgarian on SCAME website at www.scame.it. In case of discrepancy between the Italian version and the translated ones, the Italian version is to be considered prevailing.