



CODE OF CONDUCT



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FOSBER



CODE OF CONDUCT



The Code of Conduct of Fosber S.p.A. (hereinafter, 'Fosber' or the 'Company') sets forth the ethical commitments and responsibilities in the conduct of business and corporate activities undertaken by the Company and, consequently, by its directors, employees, and collaborators in every capacity.

Fosber is convinced that ethics in the conduct of its business is an indispensable condition for its success, as well as a tool for fairness, transparency, and continuous dialogue with stakeholders, pursuing shared objectives to create value and sustainable development opportunities. To this end, Fosber has decided to adopt this Code of Conduct (hereinafter also referred to as the 'Code') which, in line with the principles of fairness, loyalty, and honesty already shared by the company, is aimed at regulating the company's activities through standards of conduct.

Fosber's Code of Conduct applies to all directors, managers, employees, and collaborators, as well as to Fosber's control bodies (hereinafter the 'Addressees')

CODE OF CONDUCT



Fosber also requires all its primary stakeholders to adhere to a conduct that is in line with the general principles of the Code itself.

Furthermore, this Code integrates and completes the organization, management, and control system adopted by the Company pursuant to Legislative Decree No. 231 of June 8, 2001, concerning the 'administrative liability of companies'

The Code aims to promote or prohibit certain behaviors, including those not expressly regulated by law, establishing ethical principles and rules of conduct that are also relevant for the reasonable prevention of the offenses provided for in Fosber's 231 Organizational Model ('Model').

CODE OF CONDUCT



This Code consists of:

- by the values and commitments undertaken by the Company;
- by the principles of conduct towards each category of stakeholder, which specifically provide the guidelines and standards that Addressees are required to follow to ensure compliance with the general principles and to prevent the risk of unethical behavior;
- by the implementation mechanisms, which describe the control system adopted to ensure compliance with the Code and its continuous improvement.

In order to make this Code known and effective for all employees and collaborators as well as stakeholders, the Company ensures its publication on the corporate website (fosbergroup.com), on the intranet, and on company notice boards. It shall be delivered to all new employees and collaborators of the Company starting from the recruitment stage and, in any case, disseminated to everyone who maintains relations with the Company itself.



WHO WE ARE



Fosber is a leading international Group in the design, production, and installation of complete corrugating lines and machinery for corrugated board.

Founded in Lucca in 1978, today the Fosber Group—through its Italian Headquarters and strategic subsidiaries in the United States, Spain, and China—supplies complete production lines and machinery retrofits worldwide, with a strong commitment to quality and customer service.

Vision

Fosber's mission is to pursue excellence in all areas of its business and to produce machinery of the highest quality with maximum reliability. Furthermore, Fosber is committed to providing its customers with the most responsive and targeted technical support, aimed at customer-centricity and the continuous improvement of process effectiveness and efficiency.

Mission

Fosber's vision aims for a sustainable future, basing its outlook on responsible innovation and continuous improvement, which guide every industrial and strategic choice. The Company develops cutting-edge technologies to offer high performance, greater reliability, and a lower environmental impact, contributing to continuous innovation.



WHO WE ARE



The main activities carried out by Fosber are:

- **design, production, and installation of complete corrugating lines** and machinery for corrugated board;
- **installation of new complete lines** and the upgrading of existing machinery around the world.
- develops and provides **proactive and predictive software systems** to monitor and optimize the performance of production lines

offers a package of **services** which includes:

- **technical assistance for automation**, fine-tuning of machines and installing advanced software to improve efficiency.
- **training for operators** and maintenance staff, with on-the-job training and specific courses to maximize quality and performance.
- **remote support** through innovative technologies, such as helmets with viewers and real-time video and audio connections.



INTEGRITY

Fosber has chosen to implement an Integrated Management System for Occupational Health and Safety, Environment, and Social Responsibility, designed, documented, and implemented in accordance with international standards:

- **ISO 45001:2018** – Occupational health and safety management systems
- **ISO 14001:2015** – Environmental management systems
- **ISO 9001:2015** – Quality management systems
- **EMAS Regulation** – Eco-Management and Audit Scheme (EMAS)
- **SA8000:2014** – Corporate Social Responsibility (Social Accountability)



Sustainability

Fosber's approach to sustainability demonstrates strong consistency and synergy with the Company's Mission. The Company sets Sustainable Development goals by implementing the following activities:

- reduction of energy consumption by centralizing temperature settings across various environments and evaluating the adoption of a photovoltaic system.
- reduction of CO2 emissions through the replacement of diesel-powered vehicles with hybrid ones;
- reduction of consumption (energy, raw materials, etc.) of the installed machinery



VALUES AND



Fosber shares a series of corporate 'guiding values' and 'commitments', already defined within the Company, with the aim of pursuing careful and responsible management of its activities and interactions with all its stakeholders.

In the development of its business, Fosber intends to maintain a consistently high commitment to aspects such as ethics, the environment, and occupational safety, consolidating its competitiveness through a responsible and fair attitude and continuous improvement across the board.



VALUES AND COMMITMENTS



Customer centricity

Fosber recognizes the importance of the Customer as the primary focus of its business. One of the Company's primary objectives is to achieve full customer satisfaction by offering excellent quality products, providing constant technical support, and demonstrating flexibility in order to establish a relationship of mutual trust and collaboration throughout all project phases, both pre- and post-sales.

Fairness and collaboration

Fosber bases all its activities on the principles of fairness, transparency, and respect. In market relations, it operates with integrity and a sense of responsibility, always maintaining ethical behavior consistent with its values. In the same way, it promotes a work environment based on mutual trust, collaboration, and open dialogue, recognizing that only through the contribution and synergy of everyone is it possible to achieve lasting and high-quality results. Fairness and collaboration represent not just a way of operating for the company, but a true culture that guides every internal and external relationship.

Continuous improvement

Fosber is committed to paying attention to every detail, aiming for optimization and excellence in every phase of the production and management process. The Company carefully monitors business processes, identifying and reducing the causes of waste, in order to continuously improve the efficiency and overall performance of every activity.

VALUES AND COMMITMENTS



Morality

Honesty, fairness, and transparency in relations with all different stakeholders, whose interests must not be violated to the advantage of others. In relations with third parties, the Company is committed to acting fairly, avoiding misleading information and conduct intended to take undue advantage of others' positions of weakness or lack of knowledge. In particular, in the performance of their duties, each Addressee shall maintain a conduct inspired by moral integrity, taking into account the various social, economic, political, and cultural contexts of reference and, specifically, the following principles:

Morality

- honesty, fairness, and good faith, assuming the responsibilities pertaining to their specific duties;
- transparency, by processing information in their possession promptly and implementing communication and information processes based on clarity, completeness, precision, and sharing, while respecting any confidential nature that such information may have.

Innovation

Fosber invests in innovative technologies and solutions to develop and offer cutting-edge products, such as high-performance, reliable, and technologically advanced machinery with an innovative design, anticipating market trends ahead of the competition

VALUES AND COMMITMENTS



Legality

Fosber considers compliance with national and international regulations as a binding and essential condition for its actions. It therefore commits itself, including through careful efforts to prevent the commission of unlawful acts, to comply with current regulations as well as generally recognized international practices.

Through the application of the Codes and Models provided for by Corporate Governance, as well as the Management Systems for Quality, Environment, Social Responsibility, and Occupational Health and Safety, Fosber guarantees the control of and compliance with all applicable laws and regulations.

Personnel Involvement

Fosber values personnel involvement, motivation, and teamwork, recognizing that the diverse skills—both human and technical—of each member mutually enrich the group and represent a fundamental element for professional growth and the achievement of ambitious corporate results.

Confidentiality

Fosber ensures the confidentiality of the information in its possession and refrains from seeking and exploiting confidential data or information, except in the case of express and informed authorization.

CRITERIA OF CONDUCT



OUR CUSTOMERS

The customer has absolute priority over all the Company's activities; Fosber is in fact oriented towards building a deep and lasting relationship with the customer through:

- the identification and satisfaction of their needs, including latent ones;
- the ability and dedication to honoring commitments made and expectations created
- the attention paid to transparency in order to avoid any kind of misunderstanding

To strengthen the esteem and, consequently, the loyalty of customers, each Addressee of the Code of Conduct must establish and manage relationships with them according to the principles of legality and morality, respecting criteria of professionalism and fairness.

To this end, Addressees are required to deal with customers with competence, precision, prudence, wisdom, dedication, and efficiency, accompanied by honesty, loyalty, availability, and transparency.

The Company requires its customers to respect the fundamental principles set forth in our Code of Conduct, taking into account their respective legal, social, economic, and cultural legal systems.



Customer Assessment

By way of example only, Addressees are required to:

1. provide customers with accurate, precise, and comprehensive information regarding the goods produced and the services provided by Fosber;
2. not use false or misleading statements in the sale or marketing of its products and services. Information disclosed in advertising and public statements must be accurate and truthful;
3. provide promotions for products and services that are fair, accurate, and consistent with current laws. Objective statements must be based on facts;
4. engage in business relations only with customers who are willing to provide the information necessary to verify the legitimacy of their economic activities and the source of the funds used.

CRITERIA OF CONDUCT



OUR SUPPLIERS

Over the years, Fosber has established a close collaboration with its suppliers, fostering frequent and direct interactions that have ensured high quality of work, full respect for people, and the protection of work environments.

The Company promotes knowledge and entrepreneurship throughout the supply chain, fostering local development while respecting and guaranteeing human and labor rights.

Fosber is committed to disseminating the key principles of the management systems to which it voluntarily adheres also to suppliers, subcontractors, and sub-suppliers, preferring those who demonstrate the willingness and ability to comply with them.

To consolidate the esteem and, consequently, the loyalty of suppliers, each Addressee must establish relationships with them based on criteria of legality and morality, respecting the principles of professionalism and integrity.

To this end, Addressees are required to carry out their activities towards customers with competence, precision, prudence, wisdom, dedication, and efficiency, as well as with honesty, loyalty, availability, and transparency.



Supplier selection

By way of example only, **Addressees are required to:**

1. Respect the principles of impartiality and independence;
2. Evaluate on the basis of objective requirements of integrity, quality, efficiency, and cost-effectiveness;
3. Ensure sufficient competition for every supply request.
4. Perform a preliminary analysis of the available information, including financial information, in order to verify their reputability and the legitimacy of their business before establishing business relations with them.
5. Evaluate their attention to environmental protection and social responsibility.

CRITERIA OF CONDUCT

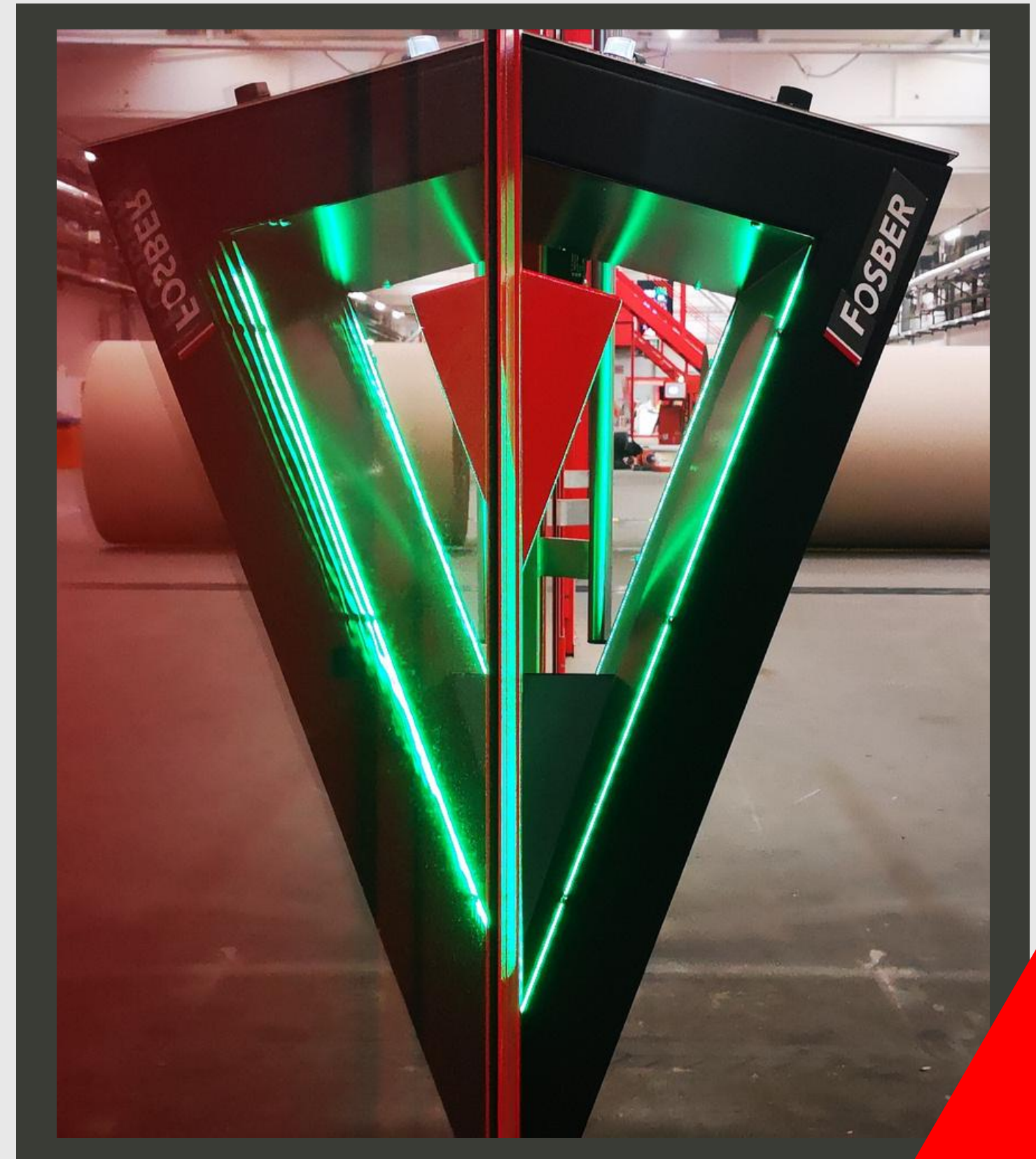


OUR SUPPLIERS

The supplier registers established within the Company must never constitute a ground for exclusion for supplying firms that are not included in them, provided that such firms can nonetheless demonstrate possession of the requirements necessary to meet the Company's expectations

Fosber and its collaborators place the utmost commitment and attention to avoid being involved in activities that imply money laundering (i.e., the acceptance or processing) of proceeds from criminal activities in any form or manner.

Fosber undertakes to include contractual clauses in agreements with suppliers that bind them to respect the fundamental principles and, taking into account their legal, social, economic and cultural systems, to comply with the provisions of this Code.



CRITERIA OF CONDUCT



COMPETITORS

Fosber recognizes that competition is a fundamental element for the country's economic and social development and progress.

To this end, in the performance of its activities, the Company ensures that the general conditions for freedom of enterprise are respected, allowing economic operators to access the market and compete with equal opportunities; furthermore, it protects its customers by fostering price containment and improvements in service quality resulting from the free play of competition.

The sale of the Company's products and services must be based solely on their merits and the benefits they offer.

This Code does not permit falsely denigrating competitors or their products and services.



Behavior towards competitors

By way of example only, Addressees are required to:

1. Comply with fair competition and antitrust regulations.
2. Report behaviors that have the purpose or effect of preventing or limiting market competition, such as, by way of example but not limited to:
 - i. the establishment of relations with Fosber's competitors to reach agreements on purchase or selling prices, quantities, or other contractual conditions;
 - ii. the stipulation of non-competition agreements or understandings, even verbal, with Fosber's competitors;
 - iii. the formulation of agreements for participation in tenders or for the allocation of markets or sources of supply (including with reference to customers, territories, or production programs).

CRITERIA OF CONDUCT



THE PARTNERS

When the Company participates in initiatives jointly with other parties, whether through the establishment of joint ventures with one or more partners, or through the acquisition of equity stakes in companies where other shareholders are present,



Behavior towards partners

By way of example only, Addressees are required to:

1. establish relations only with partners or other shareholders who enjoy a commercially reliable reputation, who are inspired by ethical principles comparable to those of the Company, and who operate in line with the Code;
1. ensure the transparency of agreements and avoid entering into secret pacts or agreements that are contrary to the law.



CRITERIA OF CONDUCT



RELATIONS WITH GOVERNMENTS AND PUBLIC INSTITUTIONS

Relations with the Public Administration are subject to specific attention, which translates into a general control system and for individual activities identified as 'sensitive' such as, for example, the execution of contracts for the sale of goods and services with public entities and the negotiation and conclusion of contracts for the sale of goods and services with public entities, in Italy and abroad, through public tenders and/or private negotiations.



By way of example only, the Addressees are required to comply with the following principles:

1. It is necessary to act at all times in compliance with the law and proper commercial practice, with an express prohibition on engaging in conduct that, in order to benefit the Company or pursue its interests, is such as to constitute a criminal offense.
2. When any business negotiation, request, or relationship with the Public Administration is underway, employees, collaborators, and all those acting on behalf of the Company must not seek to improperly influence the decisions of, or induce to perform acts contrary to official duties—even if carried out to the advantage or in the interest of the Company—the managers, officials (including officials who negotiate or make decisions on behalf of the Public Administration), or employees of the Public Administration, or their relatives and cohabitants.

By way of example, but not limited to, the Addressees of the Code must not, either directly or indirectly:

1. examine or propose employment and/or business opportunities that may benefit Public Administration employees in a personal capacity;
2. offer to provide money in any way;
3. distribute gifts exceeding a modest value (indicatively set at €150) or that are in any case likely to compromise the integrity or reputation of either party, or that could be interpreted by an impartial observer as aimed at acquiring improper advantages;
4. exert unlawful pressure or promise any object, service, or performance;
5. submit false statements to national or EU public bodies in order to obtain public grants, contributions, or subsidized financing, or to obtain concessions, authorizations, licenses, or other administrative acts;
6. alter the operation of a computer or telecommunications system or manipulate the data contained therein in order to obtain an unjust profit, causing damage to the Public Administration;
7. allocate sums received from public bodies as grants, contributions, or financing, to purposes other than those for which they were assigned
8. solicit or obtain confidential information that could compromise the integrity or reputation of either party

CRITERIA OF CONDUCT



ANTI-CORRUPTION

The key to Fosber's success is the quality of the products and services it offers to the community and its customers.

Consequently, Fosber rejects corruption because it impedes progress and innovation, distorts competition, and harms the community.

Corruption causes decisions to be made based on non-objective elements; therefore, Fosber confirms its commitment to fighting corruption in all its forms and modes, maintaining zero tolerance towards such phenomena through a constant strengthening of the degree of integrity and transparency in internal conduct, so as to positively influence its reputation in the contexts in which it operates.

The ban includes the following cases, if carried out for corrupt purposes:

- entertainment, hospitality or similar expenses;
- the provision of in-kind contributions, including through sponsorships;
- the promise of employment, or other business or investment opportunities;
- the granting of discounts or personal credits;
- the provision of assistance or support to family members;
- the provision of gifts, other advantages or other benefits.



What is it?

Corruption means obtaining, or attempting to obtain, a personal benefit or advantage of any kind, through improper or illegal means. Corruption, in any form and even attempted, is prohibited. By way of example only, Fosber prohibits the following behaviors:

1. to offer, promise, give, pay, or authorize someone to give or pay, directly or indirectly, a financial advantage or other benefit to third parties,
2. accept requests from, or solicitations from, or authorize anyone to accept or solicit, directly or indirectly, an economic advantage or other benefit from third parties,
3. when the intention is to induce a third party to improperly perform any activity associated with a business or to reward them for having performed it, or to obtain, secure, or maintain business or an unfair advantage in relation to business activities, or, in any case, to violate applicable laws.

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GIFTS, BENEFITS, OR OTHER UTILITIES

Fosber recognizes that gifts, benefits, and hospitality or institutional courtesy initiatives may be part of institutional and commercial relationship management activities and are permitted, provided they remain within the scope of good faith, reasonableness, and proportionality.

In the performance of their duties, Addressees are prohibited from offering or granting to third parties, as well as accepting or receiving from third parties, directly or indirectly, gifts, benefits, or other utilities (including in the form of cash, goods, or services of any kind) that could influence or give the impression of influencing business decisions in favor of any person with whom the company maintains business relations; the exception to this is gifts of modest value (indicatively set at €150), directly attributable to standard commercial courtesy and, in any case, such that they cannot create the impression—in the other party or in an independent and impartial third party—that they are aimed at acquiring or granting undue advantages, or such as to create an impression of illegality or immorality.

Any Addressee who receives gifts or offers of gifts that do not comply with the above must immediately inform their supervisor in writing, so that appropriate measures can be taken.

Any Addressee who, in the performance of their duties, enters into contracts with third parties must ensure that such contracts do not provide for or imply gifts in violation of this Code.



CRITERIA OF CONDUCT



HUMAN RIGHTS

We want to build a global company that is inherently diverse, equitable, and inclusive.

For Fosber, this means contributing concretely and actively to the improvement of the company in all its forms: Respect for the individual, protection of labor, diversity, and equal opportunities, employee well-being, and the social development of the environment in which we work.

Fosber operates with the utmost respect for and compliance with the value of the person and of human and labor rights, as established by national and international conventions and declarations, including the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, while operating in full compliance with current laws and regulations.

Human, employment and social rights standards

- Ban on the use of child labor
- Prohibition of forced or compulsory labor
- Ban on illegal labor and clandestine immigration
- Respect for the right to union membership
- Respect for diversity and equal opportunities
- Absolute rejection of any form of abuse
- Right to privacy
- Professional growth
- Fair pay
- Respect for the rest of collaborators
- Safety, health and hygiene in the workplace
- Rejection and condemnation of harassment in the workplace
- Effective communication and teamwork

CRITERIA OF CONDUCT



HUMAN RIGHTS

Fosber considers its social reputation to be one of its most important assets and a fundamental strategic factor for the Company's success, enabling it to preserve and strengthen social continuity.

Fosber is aware of the influence its activities have on the general conditions and well-being of the Community and the Territory, and in this sense, it operates through a precise self-monitoring action on the application of the contents of the Code of Conduct.



The Company is committed to ensuring that all its employees, collaborators, and external consultants adopt—within the scope of their activities on behalf of Fosber—both personal and organizational behaviors that not only comply with the guidelines of the Code of Conduct but are also aimed at maintaining and developing a positive social reputation in every aspect.

Furthermore, it is a social rule that Fosber's collaborators, in any capacity, during the performance of their work and in any case whenever their activities of any nature are linkable to Fosber, must adopt behaviors that do not create negative or disruptive interferences with the Community and the Territory.

Furthermore, it is a social rule that Fosber's collaborators, in any capacity, during the performance of their work and in any case whenever their activities of any nature are linkable to Fosber, must adopt behaviors that do not create negative or disruptive interferences with the Community and the Territory. For this reason, Fosber defines as a social rule that relations with the outside world must be guided by truth, fairness, and generosity, honoring all commitments made.

It is also a social norm to treat everyone with equal attention and respect.

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SELECTION, DEVELOPMENT AND PROFESSIONAL TRAINING

In selecting and managing personnel, the Company adopts the following criteria:

- of merit;
- of competence;

evaluating individual abilities and potential and rewarding their success in a transparent manner.

Fosber ensures that the assessments of the Addressees are not focused exclusively on results, but also on the manner in which they are achieved.

Fosber guarantees all employees a regular contract that complies with all the regulations of the reference Country and is consistent with the National Collective Labour Agreement (CCNL) regarding working hours for Italy.

EQUAL OPPORTUNITIES

Fosber is constantly oriented towards respecting diversity and equal opportunities and the prevention of any type of discrimination. The Company is committed to operating in a context free from discrimination of any kind (racial, cultural, ideological, sexual, physical, moral, religious, etc.), as well as to offering equal opportunities and equal conditions to all employees, collaborators, and stakeholders.

It is therefore prohibited:

1. engaging in behaviors that may create an intimidating or offensive climate towards colleagues or collaborators and hurt the feelings of others, including sexual harassment (such as unwelcome physical contact, gestures and statements with sexual connotations, and the display of images);
2. taking retaliatory actions against any employee who, in good faith, opposes or reports potential cases of discrimination, harassment, or personal offense.
3. implementing discriminatory policies in the talent acquisition and compensation process.

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HARASSMENT AND VIOLENCE IN THE WORKPLACE

Fosber recognizes the right of every person to work in a safe, respectful working environment free from harassment and violence. Harassment is defined as any unwanted conduct, including repeated actions, having the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Workplace violence is defined as behaviors, acts, or threats—even if occasional—that cause or may cause physical, psychological, sexual, or economic harm to a person, within the scope of or in connection with work activities.

These include, by way of example and not limited to:

- Physical assaults or threats;
- Verbal abuse (insults, intimidation, shouting, offensive language);
- Sexual harassment (physical, verbal, or non-verbal);
- Systematic harassing or persecutory behavior;
- Undue pressure, blackmail or abuse of power;
- Discriminatory behaviors based on gender, age, ethnic origin, nationality, religion, disability, sexual orientation, gender identity, or other personal characteristics protected by law;
- Cyberharassment via company or personal devices used for work purposes.

Retaliatory conduct resulting from refusal to respond to harassing behavior or from reporting it is also prohibited.

Preventing and combating harassment and violence in the workplace is a shared responsibility of all people who work, in any capacity, on behalf of Fosber.

Every employee, collaborator or third party is required to:

- Adopt behaviors characterized by respect, correctness and professionalism;
- Refrain from any form of harassment, violence, discrimination or abuse of power;
- Actively contribute to the creation of a safe and inclusive work environment;
- Promptly report any risky situations, inappropriate behaviors, or incidents of which you become aware.

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HEALTH AND SAFETY IN THE WORKPLACE

Respect for the individual, protection of labor, health, safety and well-being of workers, and the social development of the context in which we operate are primary values for Fosber.

On a daily basis, Fosber demonstrates its commitment by monitoring its processes, implementing tools that guide the adoption of safe behaviors by everyone, and providing expertise, instrumental resources, and financial means aimed at continuous improvement in health and safety.

Fosber is committed to disseminating and consolidating a culture of workplace safety that develops risk awareness and promotes responsible behavior on the part of all Addressees.

We act to preserve—above all through preventive actions—the health and safety of workers, also by defining and implementing appropriate reference standards. Health and safety management is ensured by the voluntary implementation of a Management System certified according to the UNI ISO 45001:2018 Standard, aimed at governing potential risks and for the benefit of all stakeholders. This system guarantees the identification of technical and organizational measures and the application of specific codified procedures.

We carry out technical and organizational interventions through:

1. The integrated risk and safety management system;
2. Continuous analysis of the risk and criticality of the processes and resources to be protected;
3. Monitoring and updating working methodologies;
4. The definition and development of training and communication interventions aimed at all levels of the organization;
5. The promotion of occupational health and safety, including through actions that involve the active participation of the Addressees.

Protecting well-being
of the workers



To ensure the well-being, health and safety of its employees and collaborators, Fosber is committed to:

1. Share skills, instrumental and financial resources aimed at continuous improvement in health and safety;
2. Designing spaces and workplaces that meet the highest standards of compliance with current workplace health and safety regulations;
3. Implement ongoing health and safety training programs for your employees
4. Encourage employee proactivity and participation through reporting potential dangers;
5. Analyze and implement activities to mitigate potential risks identified;
6. Consolidate the health and safety management process over time, improving its performance

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CONFLICT OF INTEREST

The Addressees, in the performance of their duties, shall avoid situations involving conflicts of interest.

Any situation potentially capable of generating a conflict of interest, or otherwise compromising the Addressee's ability to make decisions in the best interest of the Company, must be immediately reported to their Supervisor and results in the obligation for the Addressee in question to refrain from performing acts connected or related to such situation.

The regulations regarding conflicts of interest for members of the administration and control bodies pursuant to the law shall remain unaffected, without prejudice to the application of the regulations contained in the Procedure for Related Party Transactions, approved by the Board of Directors, as amended or supplemented from time to time.



What is it?

By way of example, conflicts of interest may arise from the following situations:

- taking on corporate roles or carrying out work activities of any kind for customers or suppliers;
- acquisition of economic and financial interests by the Addressee or their family in the activities of suppliers or customers (such as, by way of example, the direct or indirect acquisition of equity stakes in the share capital of such entities).



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ENVIRONMENT

In line with its business philosophy, Fosber constantly pursues its commitment to reducing its environmental impacts, an essential condition for guaranteeing people's health and quality of life. The Company contributes, in the appropriate venues and in the performance of its industrial activities, to the promotion of scientific and technological development aimed at environmental protection and the safeguarding of resources.

The Company and all employees act in accordance with current laws and regulations in order to protect the environment and reduce pollution.



How to protect the environment?

Fosber's commitment is expressed through the implementation of the following actions:

1. Energy saving initiatives;
2. Control and monitoring of consumption;
3. Logistics efficiency (transport and distribution management);
4. Minimizing waste of water resources;
5. Monitoring chemical use in operational activities and throughout the value chain.



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ACCOUNTING AND INTERNAL CONTROLS

THE COMPANY recognizes the primary importance of internal control for proper management and for the reliability, correctness, transparency, and credibility of corporate information.

Every collaborator and every company department is responsible for the truthfulness, authenticity, and originality of the documentation and information processed.

In order to ensure the proper keeping of mandatory accounting records, the correct preparation of the financial statements, reports, prospectuses, and corporate communications in general, as well as regular monitoring activities by internal and external bodies and Public Authorities, the Company requires its directors, collaborators, and third parties acting on its behalf to comply, in particular, with the following principles:

ANY COLLABORATOR WHO BECOMES AWARE OF OMISSIONS, TAMPERING, FALSIFICATIONS, OR NEGLIGENCE IN THE ACCOUNTING OR SUPPORTING DOCUMENTATION ON WHICH THE ACCOUNTING RECORDS ARE BASED, IS REQUIRED TO REPORT THE FACTS TO THE APPOINTED SUPERVISORY BODIES.



Operating practice in preparing the financial statement

Fosber's commitment is expressed through the implementation of the following actions:

1. Prepare financial statements and corporate communications required by law with clarity and transparency, providing a fair and truthful representation of the company's financial position and assets;
2. not to prevent or in any way hinder the performance of the control activities legally assigned to the designated persons;
3. in communications to Public Authorities, not to state untruthful facts regarding the economic, equity, or financial situation, nor to conceal others relating to the aforementioned situation;

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PERSONAL DATA PROTECTION

IN CARRYING OUT ITS ACTIVITIES, Fosber processes personal data, including sensitive data, of its customers, employees and service users.

The databases managed by Fosber may contain personal data protected by privacy laws, data that cannot be disclosed externally, and finally data whose disclosure could cause damage to the Company itself.

We respect European legislation on personal data and the privacy of our employees, collaborators, suppliers, and users of our services.

Shareholders, employees, collaborators, and anyone having relations with Fosber must safeguard, in accordance with the principle of confidentiality, the protection of technical, financial, legal, administrative, personnel management, and corporate activity know-how and, more generally, all information obtained in connection with the duties and assignments performed, recognizing its ownership by Fosber. Furthermore, any unlawful processing of data and the commission of any cybercrime are prohibited.

TO THIS END, THE PROCESSING OF PERSONAL DATA IS PERMITTED ONLY TO AUTHORIZED PERSONNEL, WITHIN THE LIMITS OF THEIR MANDATE AND IN COMPLIANCE WITH THE LAWS IN FORCE IN EACH COUNTRY AS WELL AS FOSBER'S INTERNAL PROCEDURES INSPIRED BY THEM.



Data Protection

By way of example only, each Addressee must:

- acquire and process only the necessary data directly connected to their functions
- store the data in such a way as to prevent third parties from gaining knowledge of it;
- communicate and disclose data within the scope of the procedures or with the prior authorization of the person delegated to do so;
- determine the confidential and proprietary nature of the information;
- ensure that there are no confidentiality obligations by virtue of relationships of any nature with third parties;
- Treat with absolute confidentiality, even after the termination of their relationship with the company, all data, news, and information they come into possession of, avoiding their disclosure or use for their own speculative purposes or those of third parties. The aforementioned rules on correct information management are the subject of periodic information initiatives involving the staff.

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INTELLECTUAL PROPERTY AND COPYRIGHT

THE PROTECTION OF the Company's intellectual property, including patents, trade secrets, trademarks, distinctive signs, technical and scientific knowledge, know-how, and skills acquired during business activities, is fundamental to maintaining the company's competitive advantage.

Employees are required to define, protect, maintain, and defend the Company's rights in all areas of intellectual property and those that are commercially relevant, and to exercise such rights in a responsible manner.

In addition to protecting the Company's intellectual property rights, the intellectual property rights of others must also be respected.

Many of the materials and contents used are protected by copyright legislation. Reproduction, distribution, or modification of copyrighted materials without the consent of the copyright holder is unlawful and prohibited under this Code. Unauthorized duplication of copyrighted materials may result in violations subject to civil and/or criminal penalties.



How is privacy protected?

By way of example only, the Addressees must comply with the following rules of conduct:

- 1.any intellectual and/or industrial property right relating to software and/or products protected by copyright or other intellectual and/or industrial property rights must be preserved by the company;
- 2.Only authorized and licensed software acquired from official and reliable sources should be used;
- 3.where licenses provide for a maximum number of users, use restrictions, usage volumes, or a maximum number of installations, these limits must not be exceeded, and compliance with them must be periodically monitored to verify adherence to the relative license conditions;
- 4.employees must adopt appropriate behaviors in order to preserve and protect the intellectual or industrial property rights (content, software, know-how, patents, logos, videos, images, and trademarks) of the legitimate owner. In particular, the duplication and publication of these elements are prohibited unless expressly authorized, as is their conversion into formats other than the original ones where not authorized;
- 5.only content defined and authorized by the company is permitted to be uploaded

CRITERIA OF CONDUCT



FOCUS ON ARTIFICIAL INTELLIGENCE

Fosber recognizes the potential of Artificial Intelligence (AI) as a driver of innovation and competitiveness in the machinery sector, committing to developing, using, and integrating AI solutions in a responsible and secure manner, in compliance with fundamental ethical and social values.

The objective is to promote an use of AI that enhances the quality, safety, and sustainability of our products, while respecting both people and the environment.

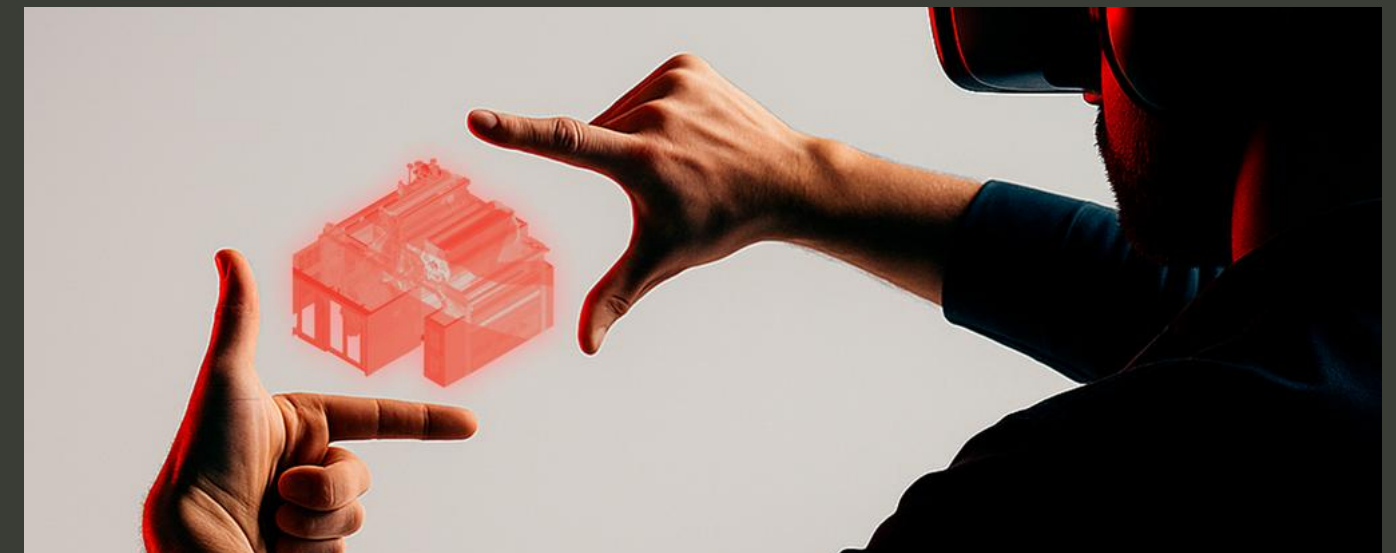
Whether it involves optimizing production, improving material quality, supporting marketing, advertising, and administrative activities, or personalizing the customer experience, the use of AI must always reflect the Group's commitment to responsibility, transparency, and respect for human rights.



How to use artificial intelligence?

By way of example only, the Addressees must comply with the following rules of conduct:

1. All products implemented with Fosber AI must pursue innovation with a sense of social responsibility.
2. AI-driven decisions that impact individuals must be made by humans. AI must be a support tool at the service of people.
3. Fosber is committed to developing secure, reliable, and understandable AI products that maintain the trust of the Company's stakeholders.
4. Fosber is committed to developing AI products in compliance with the principles of legality and oriented towards ethical principles.



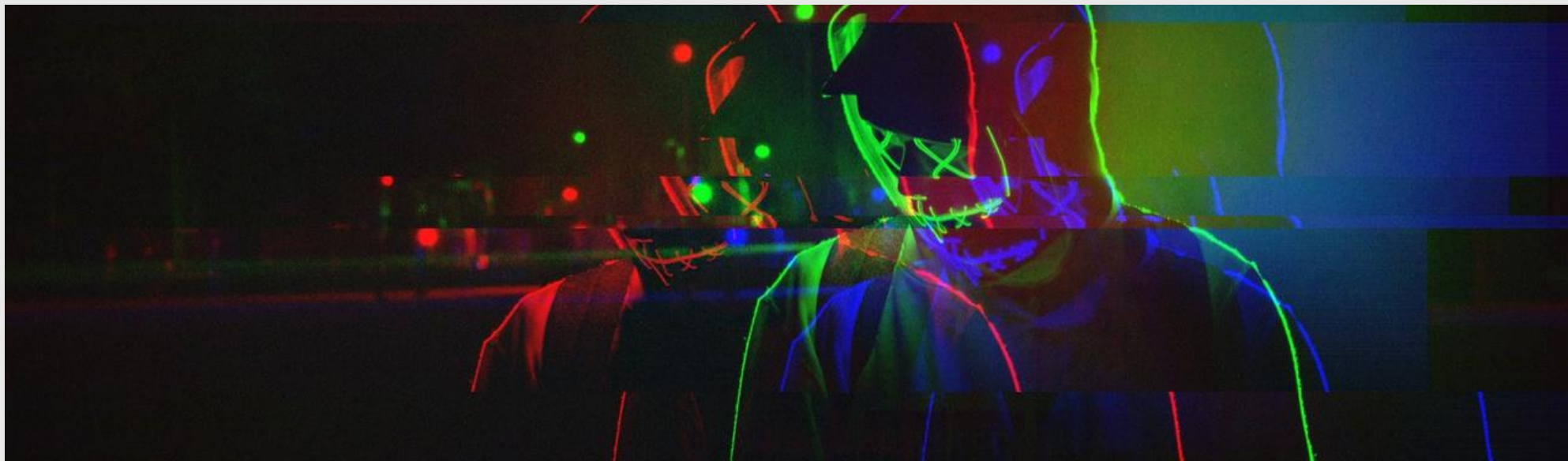
CRITERIA OF CONDUCT



THE PROTECTION AND CORRECT USE OF COMPANY PROPERTY

Every collaborator is required to act with due diligence to protect company assets, through correct and responsible behavior and in line with the operating procedures established to regulate their use, accurately documenting their employment.

Every collaborator is responsible for the protection, proper conservation, and correct use of the assets entrusted to them, and has the duty to promptly inform the relevant departments of any threats or harmful events to the Company.



What are illegal behaviors?

By way of example only, each collaborator is prohibited from:

1. Accessing company information through devices other than those assigned by the company, or accessing data, servers, or any account for purposes other than the conduct of work activities;
2. reveal passwords or allow others (including family members) to use your personal account;
3. introduce malicious programs (so-called malware) into the network, devices or servers;
4. perform network port scanning unless previously authorized by the Security Function;
5. carrying out any form of network monitoring that intercepts data not intended for the employee's host, unless this activity is part of the employee's normal duties/work;
6. Using any program, script, or command, or sending messages of any kind, with the intent to interfere with or disable a user's terminal session, by any means, whether locally or via the Internet/Intranet/Extranet;
7. consulting websites with content that is offensive, harassing, vulgar, blasphemous, xenophobic, racial, pornographic, or otherwise inappropriate or illegal, or engaging in hacking activities;
8. publishing, downloading, or transmitting files containing material of an unlawful nature or origin, or that is obscene, threatening, or offensive, including documents that incite racial hatred or that could in any way constitute a violation of laws, regulations, or internal company policies;
9. use company IT resources for any type of betting or gambling

IMPLEMENTING PROVISIONS

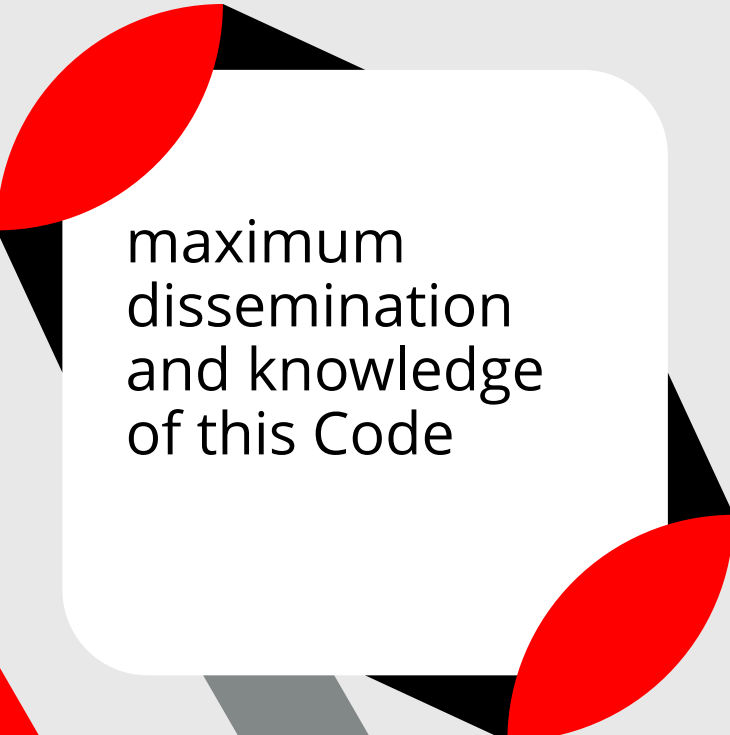
Effectiveness of this Code
towards the Addressees



Compliance with this Code of Conduct by the Addressees constitutes an integral part of the employees' contractual obligations, also pursuant to and for the purposes of Art. 2104 of the Italian Civil Code, both in their relations with each other (so-called internal relations) and in their relations with third parties (so-called external relations).

Application of the Code of Conduct

In order to pursue compliance with the principles set out in this Code, Fosber ensures:



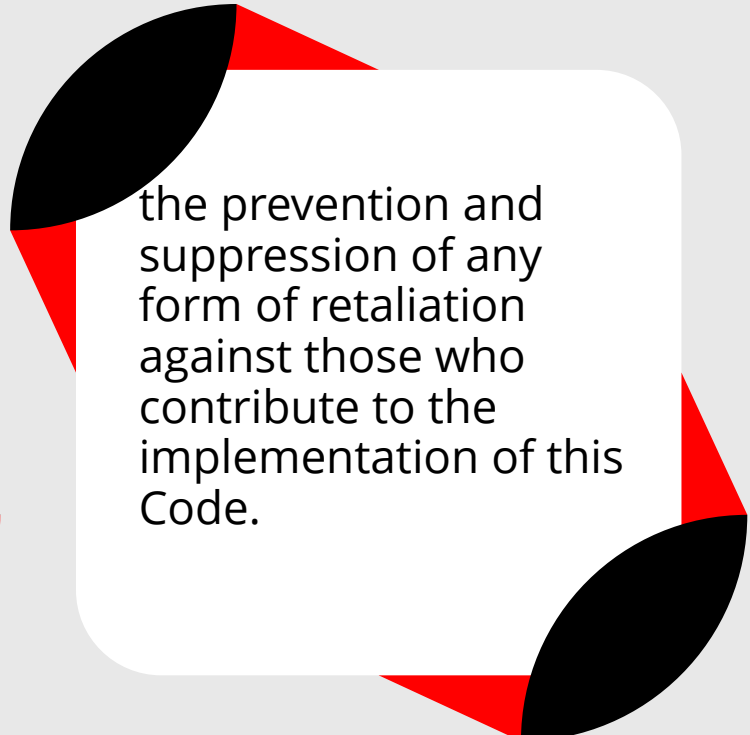
maximum
dissemination
and knowledge
of this Code



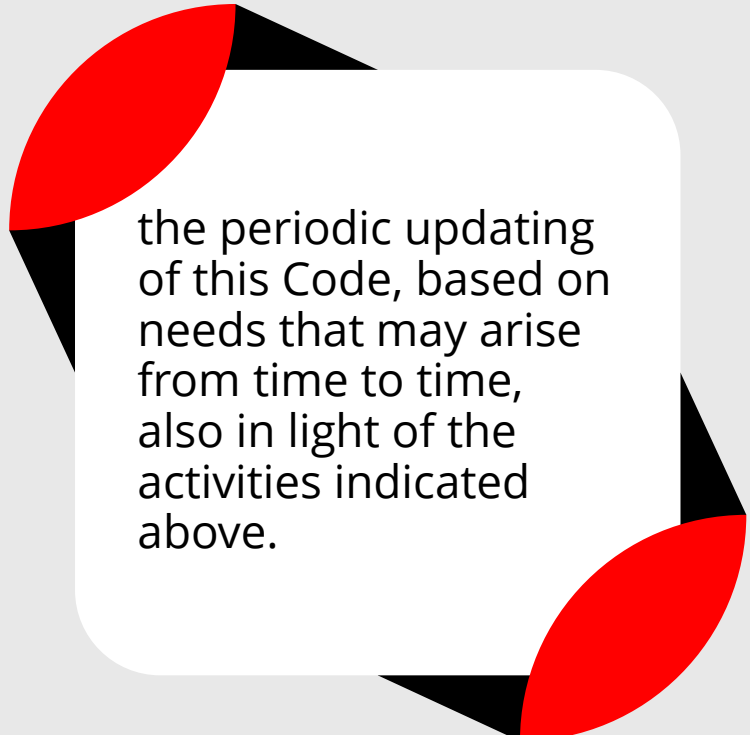
the
interpretation
and uniform
implementation
of this Code



the carrying out of
investigations
regarding reports of
violations of this Code
and the application of
sanctions in case of
such violations, in
accordance with
current legislation.



the prevention and
suppression of any
form of retaliation
against those who
contribute to the
implementation of this
Code.



the periodic updating
of this Code, based on
needs that may arise
from time to time,
also in light of the
activities indicated
above.

IMPLEMENTING PROVISIONS

Recipients must apply the provisions of the Code of Conduct in internal relationships and with third parties. In particular:



the directors and the supervisory bodies, within the scope of their functions, shall be inspired by the principles of this Code

Directors and managers shall conform their conduct to the principles set forth in this Code and require their employees and collaborators to respect them. To this end, their conduct must constitute an exemplary model of compliance and implementation of the Code.

Employees and collaborators must align their conduct with the principles set forth in this Code and with the communications of their managers.

For the purposes of this Code, each individual is directly responsible for the coordination and/or control of the collaborators under his or her direction and is vigilant in preventing violations of this Code. In particular, each director and/or manager has the obligation to:

- communicate to its collaborators, in a clear, precise and complete manner, the obligations to be fulfilled and specifically the obligation to comply with the law and this Code;
- communicate to their collaborators in an unequivocal manner that, in addition to disapproving of any violations of this Code, such violations may constitute a breach of contract and/or a disciplinary offense, in accordance with current legislation, and may therefore be subject to sanctions;
- promptly report to their superior their own findings as well as any information reported to them by their collaborators regarding potential or actual violations of this Code by any employee or collaborator;
- within the scope of the functions assigned to them, to implement or promote the adoption of suitable measures to prevent the continuation of violations and to impede retaliation against their collaborators or any other employee or collaborator.

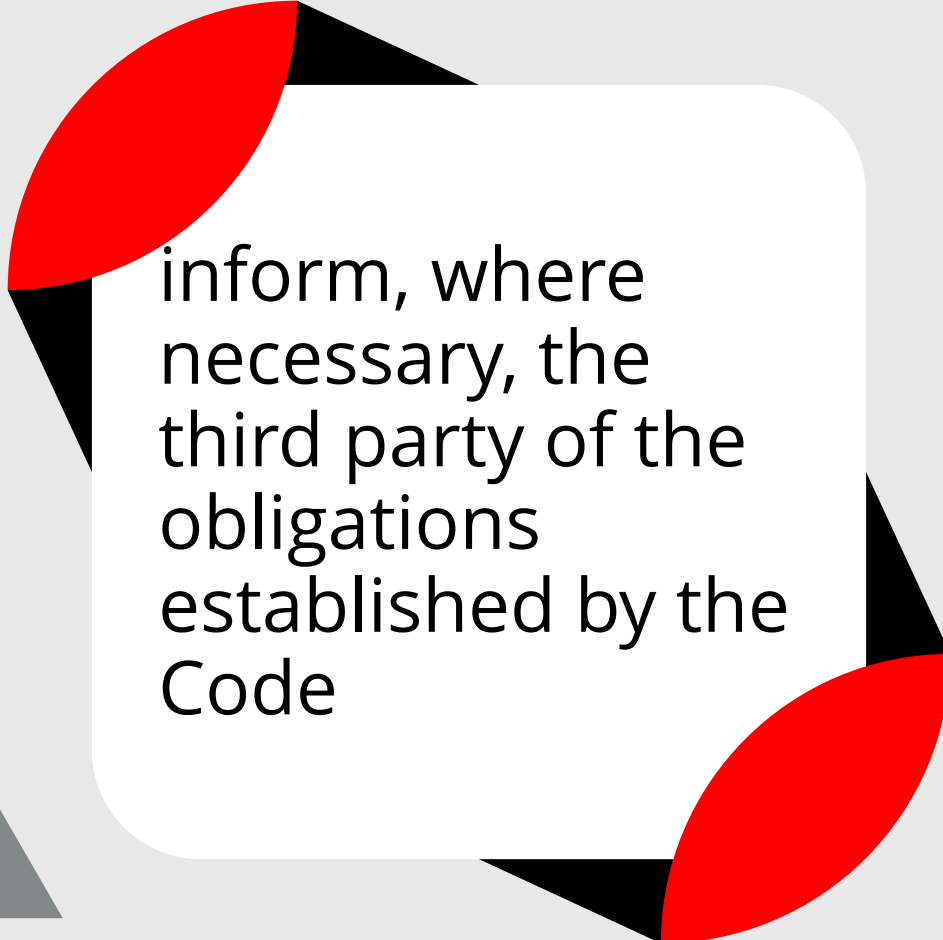
IMPLEMENTING PROVISIONS

Effectiveness of this Code towards
third parties



Fosber promotes awareness of the fundamental principles of this Code among the third parties with whom the Company maintains relations, taking into account the relevant legal, social, economic, and cultural framework. This is also achieved through the inclusion of specific clauses in the respective contracts and templates between such parties and the Company, establishing the obligation for these third parties to observe, within their own activities and organization, the general principles referred to in this Code.

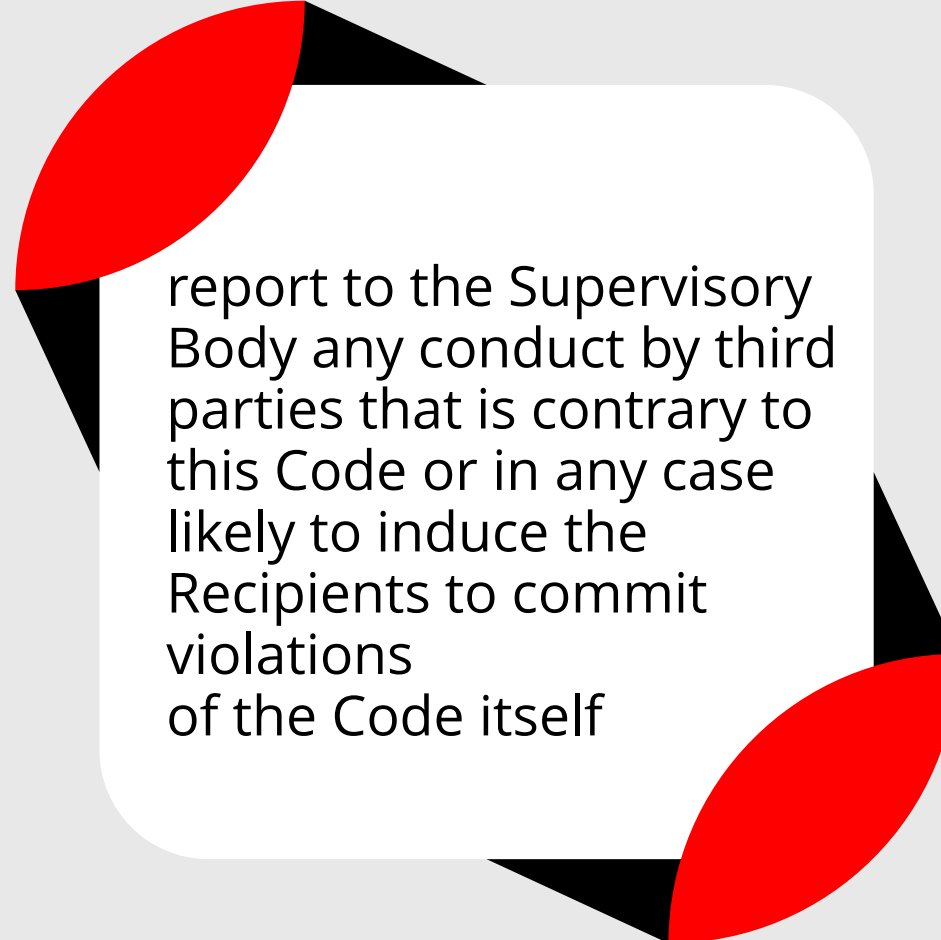
Relationship with third parties. The Addressee who, in the exercise of their functions, comes into contact with third parties, shall:



inform, where necessary, the third party of the obligations established by the Code



demand compliance with the obligations arising from this Code that directly concern their specific activities;



report to the Supervisory Body any conduct by third parties that is contrary to this Code or in any case likely to induce the Recipients to commit violations of the Code itself

IMPLEMENTING PROVISIONS



There **Revision** of the Code is approved by the Board of Directors upon proposal of the Chief Executive Officer. The proposal is formulated taking into account the stakeholders' assessment regarding the principles and contents of the Code, also by promoting their active contribution and the reporting of any deficiencies.

All employees and collaborators of the Company are required to cooperate with the Supervisory Body, providing, where necessary, the company documentation required for the carrying out of its duties. In case of doubt regarding the lawfulness of a specific behavior, its ethical significance, or its non-compliance with the Code, the Addressee may contact their superior and/or the Supervisory Body.

The **reporting** of any potential misconduct by the Addressees must be in writing and may be submitted, in addition to the hierarchical line, to the Supervisory Body via email or internal mail.

Fosber has set up a system for receiving, analyzing and processing reports of alleged violations (Whistleblowing):

<https://areariservata.mygovernance.it/#!/WB/FOSBER>

The Whistleblowing Policy adopted by Fosber intends:

1. to ensure the confidentiality of the whistleblower and in the spirit of the rule, protect him/her from possible retaliation;
2. to promote a culture based on responsibility and ethics;
3. to allow FOSBER's Corporate and Control Bodies to be informed of facts or conduct contrary to the adopted ethical principles, in order to identify and manage possible deficiencies in the internal control and risk management system;
4. to provide guidelines for making and handling reports effectively, responsibly and in compliance with the law.

Reports concerning potential violations may be addressed to the Board of Directors, so that it may delegate one of its members to carry out the investigations deemed necessary and/or appropriate. All reports received will be treated with the utmost confidentiality.

Any **Violation** by the Addressees may constitute a breach of contract and/or a disciplinary offense and, where applicable, may lead to compensation for any damages incurred by the Company as a result of such violation, in accordance with current legislation and the collective bargaining agreements as applicable from time to time. Regarding disciplinary sanctions in case of violations of the Code and the related disciplinary proceedings, reference is made to the provisions set forth in the National Collective Labour Agreement and/or local labour laws.



**Thank you
for your
time**

