

1. Code of Ethics

1.1. Preamble

HV Hydraulic S.r.l. (hereinafter, “**HV Hydraulic**” or the “**Company**”) aims to fully comply with the laws and regulations in force, in relation to the performance of its activities. With the issuance of this Code of Ethics (hereinafter, the “**Code of Ethics**”), the Company also aims to guide the conduct of corporate bodies and their individual members, employees and contractors in various capacities of the same and ethical values in business management, through self-discipline and the adoption of the best techniques and procedures for *corporate governance*.

Compliance with the law and statutory provisions, ethical integrity and fairness are fundamental values on which the Company bases its operations. In particular, it is the Company’s objective and constant commitment to conduct its business and activities in a framework of transparency, honesty, integrity, fairness and good faith, safeguarding the interests of customers, employees, business partners and – in general – the community in which HV Hydraulic operates.

The Company believes that the orientation towards ethics is to be considered as an indispensable approach in terms of reliability towards the entire civil and economic context in which the Company operates. Such needs are met by the drafting of this Code of Ethics, representing a system of rules to be observed by all those who work in the name and on behalf of the Company, both with reference to internal relations and with external subjects. Moreover, the importance of this Code of Ethics is made increasingly current by the directions referred to in Legislative Decree no. 231 dated 8th June 2001 (hereinafter, “**Legislative Decree 231**”), and subsequent additions and amendments, in which the centrality of the document in the internal control system of companies is highlighted, in order to prevent the commission of crimes. The Company has thus adopted this Code of Ethics – together with the Organisation, Management and Control Model pursuant to Legislative Decree 231 (the “**Model**”) of which this Code of Ethics forms an integral part, and undertakes to disclose both of the aforementioned documents, through specific internal and external communication activities, including through its website, and to all those with whom it has regular dealings.

1.2. Recipients of the Code of Ethics

The following are the Recipients (hereinafter the “**Recipients**”) of the Code of Ethics:

- a. The members of the corporate bodies (Board of Directors and Board of Statutory Auditors) and the Supervisory Body, who must adopt the principles of the Code of Ethics in carrying out their corporate activities;
- b. The managers and all those who perform (including de facto) management, administration, direction or control functions for the Company, who must give concreteness to the values and principles contained in the Code of Ethics, taking responsibility for internal and external duties, strengthening trust, cohesion and team spirit;

- c. Other employees, contractors and all those who are operating under the direction or supervision of the persons referred to in the preceding points who, in due compliance with the law and regulations, must adapt their actions and conduct to the principles, objectives and commitments envisaged by the Code of Ethics;
- d. Third parties who for any reason come into contact with the Company and who are linked to it by legal relationships that could be relevant for the purpose of committing the crimes referred to in Legislative Decree 231.

Any Recipient who, during the performance of their functions, comes into contact with third parties must:

- Inform, as far as relevant and necessary, the third party of the obligations set forth by the Code of Ethics;
- Demand respect and observance of the Ethical Principles contained in the Code of Ethics concerning the activities in which the third party is involved;
- Inform the Supervisory Body about any third-party conduct that violates the Code of Ethics.

Compliance with the Code of Ethics constitutes a specific duty of care on the part of the Recipients indicated in Points a), b) and c) and any relative violation may be charged by the Company as an unlawful act, whereby any damage derives therefrom.

The Code of Ethics is subject to annual verification and possible updating by the Board of Directors of HV Hydraulic, following an investigation by the Supervisory Body, which may also make proposals to the same Board of Directors.

The Code of Ethics expresses the values to which all Recipients must comply, accepting the responsibilities, structures, roles and rules whose violation – even if not resulting in any corporate responsibility towards third parties – they assume personal responsibility for both inside and outside of the Company. The knowledge and observance of the Code of Ethics by all those who work for HV Hydraulic are thus primary conditions for the Company's transparency and reputation.

Each Recipient is therefore required to be aware of the principles and contents of the Code of Ethics and to actively contribute to its implementation and to report any shortcomings or violations. Responsibility for the implementation of the Code of Ethics, its application and its updating falls to the Directors and any Recipients who report any violations or non-compliance to the Supervisory Body that monitors the functioning and compliance with the Model and this Code of Ethics.

The Code of Ethics consists of:

- General Ethical Principles that define the fundamental standards of reference shared and recognised by the Company, as well as the Guiding Values adopted in the exercise of business activities;
- Criteria of Conduct that provide specific guidelines and standards that the Company and

Recipients must follow in order to fully comply with the General Ethical Principles and to prevent unethical behaviour;

- The mechanisms necessary to implement, monitor and disseminate respect of and compliance with the Code of Ethics.

Compliance with the laws, loyalty, professionalism, managerial transparency and fairness, trust and cooperation form the Ethical Principles to which HV Hydraulic inspires and from which it derives its own models of conduct, in order to effectively and fairly compete on the market, improve the satisfaction of its customers and develop the skills and professional growth of its human resources.

All activities carried out by the Recipients must be carried out with professional commitment, moral scrupulousness and management professionalism, also in order to protect the Company's image. Behaviours and relationships with all Recipients, inside and outside the Company, must be inspired by transparency, fairness and mutual respect. In this context, the work of the directors, general manager and managers must first represent an example for all HV Hydraulic human resources by adhering, in the performance of their duties, to the principles inspiring the Code of Ethics along with the Company's procedures and regulations, taking care of the dissemination among employees and urging the submission of requests for clarification or proposals for updating where necessary.

Under no circumstances does the belief to be in some way acting for the benefit or the interest of the Company justify the adoption of conduct in contrast with the aforementioned principles.

2. General Ethical Principles

The provision of the Code of Ethics allows, above all, to sanction the contents of the Guiding Values that inspire the Company's entrepreneurial culture, supporting its identity in the context of the contemporary market and civil society.

2.1. Compliance with Laws

HV Hydraulic bases its work on the timely compliance with the laws in force in the countries in which it conducts its activity, the rules of the market, the principles inspiring fair competition, the principles set out in this Code of Ethics and the procedures provided for by the specific internal protocols.

Recipients are thus required, within the scope of their respective competences, to know and observe the laws and regulations in force (undertaking to verify the compliance of their conduct with the legislation of countries other than Italy in which the Company operates). Recipients' relations with the authorities and public institutions must be based on the utmost fairness, transparency and collaboration, in full compliance with all laws, regulations and their institutional functions.

Any conduct in breach of the laws and regulations, from which a risk may arise for the Company, must be immediately interrupted and communicated to the Supervisory Body of HV Hydraulic.

The Company shall not initiate nor continue any relationship with those who do not intend to align with the aforementioned principles.

2.2. Integrity, Impartiality and Protection of the Individual

The Company guarantees and promotes respect for the physical and cultural integrity of each individual, as well as for interpersonal relationships. The Company's conduct is based on moral integrity and the transparency of values, honesty, fairness and good faith. In decisions that affect relationships with Recipients and external interlocutors, including by way of example the selection and management of personnel, the organisation of work, the selection and management of suppliers and relationships with institutions, the Company avoids and stigmatises any discrimination based on age, gender, health status, race, nationality, social origin, sexual orientation, political opinions, religious beliefs or any alignment with political or trade union associations.

The Company undertakes to prevent the creation of a work environment in which intimidation, mutual hostility, offences or any other form of harassment of people are permitted.

2.3. Correctness in Case of Conflicts of Interest

In the conduct of business activities, it is always necessary to avoid situations in which the parties involved are, or may even appear, in conflict of interest. Therefore, situations to be avoided include where a Recipient pursues an interest other than the Company's directives or personally benefits from the Company's business opportunities, along with situations in which the representatives of external interlocutors act in contrast with the fiduciary and/or institutional duties of the position they hold.

2.4. Confidentiality, Privacy and Use of Computer Systems

The Company undertakes to ensure the confidentiality of the information in its possession and refrains from receiving confidential data outside the limits expressly set by applicable law.

Recipients are required to not use confidential information for purposes unrelated to the exercise of their activities and must comply with the procedures applied by HV Hydraulic in terms of Privacy in order to protect personal data.

The use of computer and telematic tools must be characterised by compliance with the principles of fairness and in such a way as to guarantee the integrity and authenticity of the data processed, in order to protect the interests of the Company and of third parties, with particular reference to public authorities and institutions. HV Hydraulic adopts appropriate measures to ensure that access to telematic and IT data is carried out in full compliance with the regulations in force and the privacy of the persons involved and in such a way as to guarantee the confidentiality of the information and ensure that its processing is carried out by persons expressly authorised to do so, preventing undue intrusions. HV Hydraulic defines adequate policies aimed at managing IT and telematic tools while developing adequate systems aimed at avoiding the commission of computer crimes and at ensuring compliance with all pertinent regulations in force.

2.5. Group Spirit

All conduct in the workplace must be characterised by the awareness and sharing of working towards the pursuit of common objectives, within a group aware of its own identity but which still respects the various personalities, opinions, knowledge and experiences. In this context, they also highlight behaviours aimed at uniquely and positively promoting the image and reputation of the Company, the pursuit and development of possible synergies and the exchange of experiences, knowledge and resources with external partners.

2.6. Enhancing Human Resources

The Company undertakes to enhance its resources, favouring conditions that allow people who work in and for the Company in various capacities to better express their skills and personalities, to receive the same opportunities for professional growth without any discrimination, to contribute to the decision-making processes of the Company within the scope of their attributions and according to their abilities and competencies.

2.7. Fairness

In the contractual and organisational relationships involving the establishment of hierarchical relationships within the Company, anyone in a higher hierarchical position undertakes to ensure that any authority is exercised with fairness and honesty, avoiding any abuse. In particular, the Company guarantees that the authority is not transformed into the exercise of power detrimental to the dignity and autonomy of the contractor and that the choices of work organisation safeguard the value of the contractor.

2.8. Diligence and Responsibility

Contracts and assignments must always be executed in accordance with that consciously established by the parties. Diligence and responsibility must be expressed in behaviour that in all ways impedes illegitimate and in any case incorrect behaviour, avoiding any situation or activity that may lead to conflicts of interest, instead assuming the responsibilities related to the obligations.

2.9. Loyalty and Clarity

All conduct towards employees, contractors, institutions, the Public Administration, suppliers, customers and the market must be based on loyalty and clarity, without prejudice to compliance with the provisions to protect privacy.

2.10. Transparency and completeness of information

Recipients are required to communicate complete, correct, transparent, comprehensible and accurate information, so that anyone who establishes relations with the Company may make independent decisions and be aware of the interests involved, the alternatives and the relevant consequences. In establishing and executing contractual relations, the Company is responsible

for specifying to the contractor the behaviour to be maintained in all circumstances envisaged, in a clear and understandable manner.

2.11. Efficiency and Effectiveness

Making and implementing decisions at the various operational levels of the Company must be based on efficiency and effectiveness, as determinants of success and thus as essential elements in every decision-making phase.

2.12. Service and Product Quality

HV Hydraulic sets its focus squarely on the customer, aiming to meet their needs and expectations in terms of the quality of the service provided, the products offered and assistance in solving problems. The Company orients its activities towards safeguarding customer satisfaction by listening to the requests that may favour an improvement in product and service quality. For this reason, the Company directs its research, development and marketing activities towards high quality standards aiming at constant improvement, with the ultimate goal of eliminating defects and errors, encouraging the principle of individual responsibility.

2.13. Fair Competition

The Company accepts the values of the free market and fair competition, recognising such as essential tools for development and for the achievement of legitimate profit, avoiding the conclusion of business to its advantage and contrary to the regulations in force or avoiding exploiting conditions of ignorance, dependence or weakness of its counterparts. The Company operates in the market according to the principles of fairness and fair competition, transparency and truthfulness towards all operators, refraining from collusive practices that may disturb the proper functioning of market mechanisms. The Company promotes abstention from collusive, disruptive and predatory behaviour, avoiding any abuse of a dominant position in undertaking to report to the competent authorities any practices aimed at reducing free competition in the market.

2.14. Protection of the Environment

The Company and its senior management undertake to comply with the laws and regulations in force regarding the environment within each country where its activity is carried out and to implement preventive measures to avoid or at least minimise the environmental impact. The Company undertakes to enforce these values also to third parties unrelated to the Company, linked to the same by negotiating relationships, through specific contractual clauses.

In particular, HV Hydraulic aims to:

- Adopt measures to limit and – if possible – eliminate the negative impact of economic activities on the environment not only when the risk of harmful or dangerous events is proven (principle of prevention) but also when it is uncertain whether and to what extent the business activity exposes the environment to risks (principle of precaution);

- Prioritise the adoption of measures to prevent possible damage to the environment, rather than waiting for the opportunity to repair damage that has already occurred;
- Plan careful and constant monitoring of scientific advances and regulatory developments in the environmental field;
- Promote the values of training and sharing the principles of the Code of Ethics amongst all Recipients so that they may adhere to the established ethical principles.

The Company strives to disseminate and maintain among the Recipients a high level of attention to the safety and security of the working environments, so that the production and processing processes take place in a safe environment. The safety of the environments is of primary interest to the Company. To this end, the Company encourages Recipients to report any possible doubts that may arise regarding workplace safety, by providing quick and effective mechanisms for identifying and resolving any problems.

The Company, moreover, in carrying out its business activity, follows the principles of sustainability in order to respect the environment and not jeopardise future environmental resources.

2.15. Use of Financial Resources

The Company requires all persons who utilise the Company's financial resources to act in accordance with criteria based on legality and correctness and to inform – where necessary and appropriate – the Supervisory Body on the use thereof.

Every operation and transaction must be properly recorded, authorised, verifiable, legitimate, consistent and appropriate. Therefore, for each operation, there must be a suitable supporting document to permit, at any time, checks being carried out that certify the characteristics and reasons for the operation and identify whoever authorised, performed, recorded and checked this operation.

2.16. Dissemination and Compliance with the Code of Ethics

HV Hydraulic promotes the knowledge and observance of the Code of Ethics, specific protocols and their updates amongst all Recipients, requesting compliance and providing for appropriate disciplinary or contractual sanctions in the event of non-compliance. Recipients are thus required to be aware of the contents of the Code of Ethics, to observe it and contribute to its implementation, reporting any deficiencies or violations of which they have become aware.

3. CRITERIA OF CONDUCT

3.1. General Criteria for Conduct

In carrying out its activities, the Company complies with the principles contained in this Code of Ethics and therefore undertakes to:

- Observe the laws and regulations in force governing the relevant matters in the context of the activities carried out, with particular regard to the principles and obligations enshrined in the disciplinary Code;
- Act with honesty, loyalty and reliability, based on transparency in all relations with its employees, contractors, customers and suppliers;
- Avoid conflicts of interest regarding employees of the Company between the work, professional and personal spheres;
- Reject any illegitimate behaviour, aimed at profit and speculation to the detriment of its employees, contractors, customers and suppliers;
- Promote equal opportunities for the professional development for all managers, employees and contractors of the Company;
- Ensure workplace safety, worker health and the protection of the environment;
- Ensure confidentiality in relation to news and information regarding the activities carried out and those constituting Company assets, in compliance with the legal protective provisions and with internal procedures, with particular reference to the provisions of the current disciplinary code;
- Ensure that in their relations with the Company, third parties are informed of the obligations imposed by this Code of Ethics and comply with its fulfilment.

3.2. Privacy

The Company treats all data and information that comes into its possession with the utmost confidentiality, in accordance with the provisions of current privacy legislation. The data and information regarding which the prohibition of communication to third parties and disclosure is in force generally concerns the internal organisation and management of the Company's tangible and intangible assets, the commercial operations and financial intermediation carried out by it as well as the judicial and administrative procedures that involve it. All Recipients are therefore required to maintain the utmost confidentiality regarding documents, know-how, research projects, Company operations and, in general, all information learned in the course of their work or contractual relationship.

In particular, confidential or secret information constitutes information that is subject to specific laws or regulations insofar as it relates, for example, to inventions, scientific discoveries, protected technologies or new industrial applications, formulas, models, techniques, as well as confidential information based on contracts signed with suppliers, customers or business partners. Confidential information also constitutes all particulars learned in the course of work or in any case on the occasion thereof, the dissemination or use of which may cause danger or damage to the Company or even merely undue profit in favour of the Recipient. Recipients are thus required to treat

Company data and information exclusively in the scope and for the purposes of their work activities, in any case not divulging or communicating in any way sensitive information without the explicit consent of the data subjects and confidential information without the Company's authorisation.

3.2.1. Copyright, Trademarks, Patents and Inventions

Before affixing the Company's logo or trademark on electronic or paper documents, corporate gifts or any other objects, it is mandatory to consult in advance with the Company office or area responsible for intellectual property or with the legal management.

All inventions, patentable or not, conceived or created during the performance of work tasks or contractual obligations with the Company remain the exclusive property of the Company.

3.2.2. Personal Data Processing

The personal data of which the Company comes into possession in the performance of its activity, pursuant to and for the purposes of the provisions of the specific legislation in force on the subject referred to in Legislative Decree no. 196 dated 30th June 2003 and subsequent additions and amendments, is always treated in a lawful and correct manner.

The Company does not use or transfer the personal data acquired to another Data Controller, for historical, scientific or statistical research purposes nor for promotional purposes.

Managers, employees and contractors of the Company are to:

- Collect data for specific, explicit and legitimate purposes without using such data in other processing operations in terms not incompatible with such purposes;
- Record the data accurately and update the data if necessary;
- Verify that the data is relevant and complete and that it does not exceed the purposes for which it was collected or subsequently processed;
- Conserve the data in a form allowing the data subject to be identified exclusively for a period of time not exceeding that strictly necessary for the purposes for which the data is collected and processed;
- Inform the data subject about the purposes and methods of data processing and the mandatory or optional nature of providing the data;
- Safeguard and carefully check the data in order not to run the risk of destroying or losing it, even accidentally;
- Consult only the documents and files to which they are authorised to access and use them in accordance with the official duties;
- Prohibit unauthorised access to data and its unlawful or non-compliant processing for the purposes of the data collection;

- Destroy the data if the reasons for its retention and use are no longer met or if the authorisation for its processing is withdrawn.

3.3. Gifts, Freebies and Benefits

Considered as acts of corruption are illicit payments and benefits made directly by Italian entities or by their employees, along with illicit payments and benefits made through persons acting on behalf of such entities in Italy or abroad.

The Company prohibits any form of gift, freebie or other form of concession of benefit that is not of modest value and which can only be interpreted as exceeding normal commercial practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any activity related to the Company. In particular, it is not permitted to offer money or gifts to managers, officials or employees of the Public Administration nor their relatives, whether Italian or from other countries, except in the case of gifts or utilities of modest value. In this regard, numerous public bodies have adopted their own self-regulation codes, which often set for all staff a prohibition on receiving gifts or accepting gifts greater than a defined economic value. Thus, Recipients must examine the documents adopted by the public bodies with which they come into contact on a case-by-case basis in order to comply with any rules that the body has established.

It is also forbidden to offer or accept any gifts, services or valuable acts to obtain preferential treatment in any dealings with the Public Administration.

This rule of conduct, which does not permit any exceptions even in countries where offering valuable gifts to business partners is customary, concerns both promised and received gifts.

The belief of acting in any way for the benefit or in the interest of the Company never justifies the violation of this rule of conduct.

3.4. External Communications

The Company recognises the role of the media towards the market and cooperates with them in order to assist the media in providing timely, complete and transparent information to the public regarding such.

Consistent with the principles of transparency and completeness of information, the Company's communication to the outside world is based on respect for the right to information, as well as respect for the laws and internal rules of the Company. External communications must, in any case, respect the principles of truthfulness, fairness, transparency and appropriateness and must aim to help explain the Company's policies, programmes and projects. Relations with the mass media, in particular, must be based on compliance with the law, the Code of Ethics, the relative protocols and the principles established with reference to the management of relations with public institutions, with the ultimate goal of protecting the Company's image.

The Company treats confidential information with appropriate internal procedures and takes care of the dissemination of information, able to cause effects on the prices charged on the market, through specific and timely communications, in accordance with the relevant applicable regulations.

Under no circumstances may Company representatives disclose false or biased news or comments nor may they disclose or use for their own or third parties' benefit news or confidential information relating to the activities of the Company and the Group to which they belong.

Relations with the press, television and in general with the mass media, both national and foreign, are exclusively to be handled by the Company representatives authorised to do so or by the persons delegated by them.

3.5. Corporate Disclosure

Within the limits established by current regulations, HV Hydraulic promptly and completely provides the information, clarifications, data and documentation requested by shareholders, by the corporate bodies responsible for management control, by customers, suppliers, public supervisory authorities, institutions, bodies and entities in the performance of their respective functions.

Exhaustive and clear corporate communication also guarantees the correctness of dealings with third parties who come into contact with the Company, who must be able to have a representation of the economic, financial and equity situation of the Company, as well as with the supervisory authorities, the audit and internal control bodies that must effectively carry out control activities, to protect not only the shareholders but the entire stakeholder market, also for the purposes of preparing the Company's Financial Statements and other communications.

The external communication of information pertaining to the Company must be carried out exclusively by the functions in charge and in accordance with the Company procedures in force aimed at guaranteeing truthfulness and correct dissemination.

Specific attention is paid to the dissemination of communications concerning extraordinary transactions carried out by the Company.

3.6. Internal Relations and Human Resources Management

3.6.1. Statutory Bodies

The members of the Company's statutory bodies pursue the objectives and interests of the Company in compliance with current regulations and in light of the principles and guiding values that inspire this Code of Ethics.

In view of the above, the members of the Company's statutory bodies base the performance of their activity on the values of honesty, integrity, loyalty, fairness, diligence and respect for persons.

The conduct of the members of the Statutory Bodies will thus be characterised by:

- A prohibition on giving favours or material goods, in the form of either monetary benefits or gifts of significant value, in order to obtain privileged treatment for the benefit of the Company;
- A prohibition on accepting favours or material goods in the form of monetary benefits or gifts of significant value;
- The obligation to return any gifts whose instrumental nature is manifest and unequivocal or which in any case have a value exceeding expectations of a normal relationship of courtesy or gratitude;
- A prohibition on taking advantage of one's professional position to obtain undue advantages in a personal capacity;
- A prohibition on accepting recommendations and pressures that interfere with the proper functioning of the Company;
- A rejection of the exploitation of the name and reputation of the Company for private purposes and, in any case, of attitudes that may compromise its good name and image;
- A prohibition on taking Company property and/or confidential or confidential documents outside the Company premises, except for reasons strictly connected to the fulfilment of professional duties;
- The obligation to report any attempts at interference to the Supervisory Body, in order to halt illegal behaviour that is not in accordance with the spirit of this Code of Ethics;
- The development, together with external interlocutors, of relationships inspired by propriety and impartiality, in the utmost transparency, avoiding behaviour that may have negative effects on their judgement and business decisions;
- Particular attention paid to situations that may in any case reveal circumstances in which there is a conflict of interest in the performance of one's duties.

In any one or more of these circumstances, the parties concerned are to inform the Supervisory Body without delay.

Under such circumstances, the interested parties are to:

- Specify the situations and/or activities in which they may hold interests in conflict with those of the Company;
- Specify the situations and/or activities in which their next of kin or family members may hold interests in conflict with those of the Company;
- Indicate any other case in which there are relevant reasons of convenience;
- In any event, refrain from carrying out acts connected or related to the situations represented, pending the decisions of the Company;
- Observe the decisions that will be made by the Company in this regard.

3.6.2. Selection Policies

Human resources are an indispensable element of a Company's existence and a determining factor for successfully competing in the market. The Company's objectives are determined by its honesty, loyalty, ability, professionalism, reliability, technical preparation and dedication, representing the characteristics HV Hydraulic requires of its directors, statutory auditors, employees and contractors in their various capacities.

In order to contribute to the development of the Company's objectives and to ensure that such objectives are pursued by all in compliance with the Ethical Principles and values that inspire HV Hydraulic, the Company's Policy is aimed at selecting each employee and contractor in accordance with the characteristics set out above.

As part of the selection, conducted with respect for equal opportunities and without any discrimination on the private sphere and on the opinions of the candidates, the Company works to ensure that the resources acquired correspond to the profiles actually necessary for the Company's needs, avoiding favouritism and facilitations of any kind and inspiring its choice exclusively on criteria of professionalism and competence.

The information requested from candidates is only that strictly functional to the verification of the aspects foreseen by the professional and psycho-aptitude profile required, respecting the candidate's privacy and opinions.

3.6.3. Establishment of the Employment Relationship

HV Hydraulic personnel is hired with a regular employment contract, in accordance with the laws, collective agreements and pro tempore standards in force. In particular, HV Hydraulic does not allow nor tolerate the establishment of employment relationships, even by external contractors, suppliers or business partners, in violation or circumvention of current labour legislation and particularly that relating to child, female and immigrant labour.

Each employee must receive clear and accurate information relating to:

- The characteristics of the task to be performed;
- Regulative and remuneration elements, as governed by the applicable collective bargaining agreement;
- Rules and procedures to be followed to avoid possible health risks associated with work.

3.6.4. Principles of Conduct in Human Resources Management

As an employer, the Company is committed to:

- Optimising working conditions in full respect of diversity of workers' origin, sex, culture, religion and race, safeguarding their physical and psychological integrity with the diligent and participatory application of the current regulations on the protection of the environment and the health of the worker in the workplace;

- Adopting evaluation criteria aimed at the recognition of individual merit, competence and professionalism in the management of the employment relationship with its employees and contractors, with the consequent rejection of any form of nepotism or favouritism;
- Promoting the creation of a more harmonious work environment in order to foster collaboration between individual workers and the professional growth of each;
- Combatting any type of harassment or non-professional performance and as such, instrumental to the career progression of the individual, in order to safeguard the dignity of employees and contractors.

3.6.5. Executive Staff and Contractors

The principles of conduct that characterise the work of all managers, employees and contractors are:

- The performance of their duties with transparency, fairness, professionalism and loyalty, in the consistent and shared pursuit of Company objectives;
- Compliance with the rules of law, the regulations detailed in the General Ethical Principles of conduct;
- Supervision of the full operation of the aforementioned rules, reporting any possible violation to their superior, in any case without entailing the risk of retaliation;
- The reporting to their superior of any irregularities and malfunctions regarding the management of the work activity, in any case without entailing the risk of any retaliation;
- The confidentiality of the information and documents of which they become aware in carrying out their work activity;
- The protection and conservation of the Company's tangible and intangible assets, through the competent and responsible use of the resources made available for carrying out all activities;
- Responsibility for workplace safety and hygiene, in order to ensure the efficiency and optimisation of the use of plants and equipment and to prevent the risk of injury;
- The rejection of any attitude that discriminates against colleagues and contractors for reasons based on politics, trade union association, religion, race, language, gender, age or disability;
- The rejection of the exploitation of the name and reputation of the Company for private purposes and, in any case, of attitudes that may compromise its good name and image;
- A prohibition on taking Company property and/or confidential or reserved documents outside the Company premises, except for reasons strictly connected to the fulfilment of professional duties;
- A prohibition on executing orders or implementing management deeds issued by a person who is not competent or legitimised – in such cases, the employee and/or contractor must immediately communicate the order or management deed received to their manager or superior;
- A prohibition on giving favours and material goods, in the form of either monetary benefits or gifts

of significant value, in order to obtain privileged treatment;

- A prohibition on accepting favours or material goods, in the form of either monetary benefits or gifts of significant value;
- An obligation to return any gifts whose instrumental nature is manifest and unequivocal or which in any case have a value exceeding expectations of a normal relationship of courtesy or gratitude;
- A prohibition on taking advantage of one's professional position to obtain undue advantages in a personal capacity;
- A prohibition on accepting recommendations and pressures that interfere with the proper functioning of the Company;
- The obligation to report attempts to interfere to one's manager, also allowing where appropriate the timely activation of the Supervisory Board, in order to put an end to any emerging conduct that is unlawful or in any case not in accordance with the spirit of this Code of Ethics;
- The development of relationships with external interlocutors inspired by utmost propriety and impartiality, in the utmost transparency, avoiding behaviours that may have negative effects on their judgement and business decisions.

3.6.6. Hierarchical Relationships

In carrying out their organisational and control duties, each manager represents an essential point of reference for employees subject to their management and/or coordination activities.

The manager adheres to exemplary conduct, dedicating themselves to their work with loyalty and professionalism, in open recognition of the responsibility and freedom of action of their associates, diligently supervising the fulfilment of the tasks assigned to them.

Specifically, each manager has the obligation to:

- Accurately and completely impartially evaluate their employees on the basis of their personal and professional skills;
- Unequivocally explain to their employees the tasks assigned to them and prepare them for their fulfilment through appropriate training activities accompanied by periodic assessments of work progress;
- Commensurate the remuneration of contractors with the services provided by them according to the provisions of the employment contract, without prejudice to the fact that the payment can be paid only to the person who has provided their labour;
- Promote a spirit of belonging to the Company, stimulating the personal motivation of each employee to grow professionally within the Company;
- Protect the personal and professional integrity of their employees from any form of undue limitation of professional or personal expression;

- Make their employees aware of the law and the principles of this Code of Ethics, effectively ensuring the application thereof, clarifying that violations represent a possible breach of contract and/or a disciplinary offence, in accordance with the provisions in force;
- Promptly report to their supervisor any violation of the law or this Code of Ethics detected in person or reported to them.

3.6.7. Conflict of Interests Between Managers and/or Employees

HV Hydraulic requires that in the execution of their duties, managers and employees do not incur situations of conflict of interest.

Any situation potentially likely to generate a conflict of interest or otherwise affect the ability of managers and/or employees to make decisions in the best interest of the Company must be immediately communicated by the manager and/or employee to their manager or superior.

The occurrence of such a situation shall result in the obligation to refrain from carrying out actions connected or related to said situation, unless expressly authorised by the same manager or superior. It is forbidden to personally take advantage of opportunities in any capacity that one becomes aware of in the course of the performance of their duties within the Company.

Recipients of the Code of Ethics may not benefit from gifts or donations from persons who have or may have relations with the Company, except those that can be included in the context of customs and within the limits of normal courteous dealings, provided that they are of modest value.

Before accepting a management, administration or other assignment in favour of another person, or in the event of a situation that may lead to a conflict of interest, each manager or employee is required to notify their manager or superior who will submit, if necessary, the case to the Supervisory Body.

3.6.8. Principles of Conduct in Using Company Tools and Equipment

The Company's tangible assets (such as telephone lines, hardware and software, access to the network and email, vehicles, along with various Company tools and equipment) must be used in compliance with current legislation and as auxiliary tools solely for work carried out on behalf of HV Hydraulic.

It is thus forbidden to use Company assets for personal purposes or in the pursuit of objectives in conflict with the law or with Company objectives or that in any case involve operational slowdowns.

It is not permitted to:

- Use office telephone lines for personal conversations, except in an absolute emergency;
- Use the office email for personal and/or non-work-related communications.

Additionally:

- The use of Company PCs, tablets or mobile phones is not limited, whereby in compliance with the regulations in force. It is strictly forbidden to use corporate IT tools for acts able to cause damage, interruption, modifications or the hacking of other IT systems belonging to third parties or public bodies;
- For surfing the Internet:
 - Each computer is equipped with its own personal password for access to the internet, with there being limits on browsing sites that are not considered safe or with explicit content (prohibited for minors under the age of 18);
- The use of HV Hydraulic vans and/or trucks is only allowed for work use after filling out the appropriate form.

3.6.9. Regulation of Computer Systems

The Company may make available to its managers, employees and contractors computer equipment consisting – in accordance with the different needs of users in carrying out the activities entrusted to them – of personal computers, notebooks, tablets, printers, optical pens, software, computer accessories, network access services and email, cumulatively or separately from each other. Users must avail of this equipment in such a way as to safeguard its functionality and integrity, reporting any malfunctions to the articulations responsible for the specific services. Programs may only be installed on the Company network or on the individual PCs supplied by personnel or technicians duly authorised by the Company.

In particular, it is prohibited to:

- Install unauthorised and/or unlicensed programs, in order to avoid not only the risk of spreading computer viruses but also the penalties charged to the Company for any violations of the rules protecting copyright;
- Download programs from the network, also via free download, without specific authorisation from the Company and after technical reconnaissance of the Company departments responsible for specific services;
- Make connections to the network in ways that differ from the expected IT architecture, in order to safeguard the security of the Company's entire IT system;
- Use one's email inbox to transmit various documents and attachments outside the Company computer network, in order to ensure the security and privacy of the information processed;
- Be involved in blogs, debates or forums not related to work by availing of one's corporate station for network access.

In compliance with the regulations governing such matters, the Company reserves the right to verify the conditions of use and maintenance of personal computers, notebooks, handheld devices,

mobile phones, data provided, optical pens, as well as to supervise the websites to which access has been addressed in the Company by providing any appropriate filters.

The Company cannot be held responsible for any applications or files on the personal computers supplied with data and for which explicit authorisation has not been granted.

3.6.10. Computer System Security

In order to protect the confidentiality and security of the data in its possession, the Company applies special measures to its computer systems to prevent the free circulation of information or its inappropriate use.

To this end, each manager, employee and contractor is assigned a personalised identifier and password and is allowed access to certain files programs, solely in consideration of the tasks performed.

Passwords (alphanumeric) are to be changed every six months.

Managers, employees and contractors are bound by the confidentiality of their identifier and password and must therefore avoid disclosing such data and are to periodically change their password.

Managers, employees and contractors must not leave their workplace without having taken all necessary precautions to prevent confidential information from being viewed by unauthorised persons.

3.6.11. Specific Protocols

In order to prevent harmful events, all those who intervene in the Company's operational process in any capacity must concretely follow and apply the specific operational protocols in place under the competent HV Hydraulic functions. The correct implementation of these protocols guarantees the possibility of identifying the Company subjects responsible for the decision-making, authorisation and execution of the operations. To this end, according to the principle of control represented by the separation of tasks, it is necessary that the single operations be carried out in the various phases by different subjects, whose competences are clearly defined and known within the organisation, in order to avoid any unlimited or excessive powers being attributed to a single subject. The traceability of each process related to the Company activity must also be guaranteed, so as to always be able to reconstruct *ex post* the reasons underlying the choices made, the persons responsible and any relevant data for the purposes of evaluating the correctness of the operational choices.

Within the scope of their respective competences and functions, Recipients are required to strictly comply with the procedures envisaged. Each operation must therefore be supported by adequate, clear and complete documentation to be kept on file, so as to allow a check at any time on the motives, characteristics of the operation and the precise identification of those who authorised,

performed, recorded and verified such at the various stages.

Any non-compliance with the envisaged procedures must be reported without delay to the Supervisory Body. Such violations breach the relationship of trust with the Company, being relevant from a disciplinary point of view and will be appropriately sanctioned.

3.7. EXTERNAL RELATIONS

3.7.1. Relations with Customers

As already expressed in the section dedicated to the guiding values, HV Hydraulic aims first and foremost to create value in the awareness of performing a service of primary social importance.

In order to optimise its activities, the Company seeks to interpret as reliably as possible the needs and expectations of customers in the specific area of activity and to provide a correct, complete and timely service in compliance with the principles established by the relevant legislation.

To best achieve these aims, it is therefore necessary that all Company personnel be able to decipher and meet the needs of the various customers by proposing solutions and strategies based on feasibility and effectiveness.

3.7.2. Relations with Authorities, Institutions and the Public Administration

HV Hydraulic undertakes to comply fully and scrupulously with the rules dictated by the Authorities, for compliance with the regulations in force in the sectors in which it operates.

The Company actively collaborates through its Bodies, managers, employees and contractors in any investigative procedures.

In relations with local, regional, national, EU and international institutions, HV Hydraulic undertakes to:

- Establish stable channels of communication with all institutional interlocutors involved during the conduct of their activities, without discrimination;
- Act in compliance with the principles defined by this Code of Ethics, not applying any direct or indirect pressure on managers or representatives of the Institutions to obtain favours or advantages through their own Bodies, managers, employees and/or contractors.

HV Hydraulic maintains relations with the Public Administration based on the utmost transparency, fairness and collaboration, in compliance with their respective roles and functions.

To this end, the Company prohibits any conduct that may in any way directly or indirectly involve the offering of sums of money or other means of payment to public officials or persons in charge of public services, in order to influence their activity in the performance of their duties.

Such requirements cannot in any case be circumvented by resorting to different forms of contribution which, under the guise of sponsorship, assignments and consultancies, advertising and so on have the same prohibited purposes.

In any event, gifts and forms of hospitality, offered by the Recipients of this Code of Ethics towards public officials or public service representatives, are allowed exclusively in the context of normal courtesy relationships and provided that they are not such as to compromise the integrity and reputation of the Company and/or influence the autonomy of the judgement of the Recipients. All such acts are to be in any case promptly reported to the envisaged Supervisory Body.

Likewise, Recipients of the Code of Ethics may benefit from gifts, donations or favourable treatment from external parties, including public officials or public service officers, exclusively within the framework of normal courteous relations and provided that such is of modest value.

3.7.3. Relations with Suppliers

The Company only adopts criteria of proven convenience in the choice of its suppliers, making sure that they meet all requirements that comply not only with the needs of efficiency and competence but also with the principles that inspire this Code of Ethics.

In selecting suppliers of goods and services and/or partners, the Company adheres to the following principles:

- Do not avail of suppliers and/or partners of which there are well-founded reports of direct or indirect links to criminal and illegal organisations;
- Ensure that all suppliers and interlocutors are able to provide a quality service, in compliance with the agreed deadlines and prices;
- Grant equal opportunities to each interlocutor and supplier, so that no discriminatory criteria or personal preferences are involved in the final choice but only impartial evaluations based on the actual possession of the requirements necessary for the supply of goods and/or the provision of services;
- Avoid, to any degree and level, an inappropriate exchange of favours and gifts in order not to affect the transparency and correctness of the relations that the Company has with its suppliers and partners;
- Observe the principles of transparency, completeness and confidentiality of information in correspondence with suppliers and partners,
- Avoid any conditioning by third parties outside the Company for decision-making and/or execution of acts relating to one's own work activities;

- Make suppliers and partners aware of compliance with this Code of Ethics;
- Where appropriate, establish specific and regular procedures for the acquisition of goods and services.

3.8. Guidelines for Implementing the Code of Ethics

This Code of Ethics, also in compliance with the provisions of Legislative Decree 231, prohibits any criminal behaviour that may compromise the Company from a civil, criminal and administrative perspective.

HV Hydraulic is required to inform its bodies, managers, employees and contractors, as well as its suppliers and partners, about the rules and provisions contained in this Code of Ethics, applying the sanctions provided for in the event of any violation.

Managers, employees and contractors of the Company can refer directly to their manager and, where appropriate, to the appropriate Supervisory Body both to obtain clarification on the operation of this Code of Ethics and to report any possible violation thereof.