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Code of Conduct

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ABSTRACT

1.1 PURPOSE AND CONTENT

The MCF Safety Belts S.r.l. Code of Conduct aims to establish the rules governing the behaviour of all employees and partners in the daily performance of their work.

It expresses the set of values and principles of conduct that inspire the company's activities.

It recommends, promotes or prohibits conduct by requiring compliance by persons within the Company.

It informs external parties about the principles of corporate ethics that the Company recognises as its own and on which it calls for compliance by its interlocutors (internal and external to the Company).

It includes sanctions proportionate to the seriousness of the violations committed and constitutes a valid code of conduct to increase awareness and knowledge of the ethical-social values with which the workers of MCF Safety Belts S.r.l. must comply.

All the principles set out here, after checking compatibility with the nature and modalities of each relationship, will be extended to the relations between MCF Safety Belts S.r.l. and its own contractors, subcontractors, suppliers, consultants, employees, partners and trainees with or without remuneration, in accordance with the regulations and legislation in force.

The Code is widely published internally by posting it in a place accessible to all. It is also posted and downloadable from the company website and made available to any interlocutor of the company.

The Company also promises to remind compliance with the dispositions of this Code in all the economic relations it establishes.

MCF Safety Belts S.r.l. inspires its activity to the basic principles that have always distinguished it in terms of business ethics in order to improve people's lives and allow the business to prosper by developing meaningful relationships with its Stakeholders.

MCF Safety Belts S.r.l., in compliance with the Confindustria Guidelines, national and international best practices, inspires the development of its business to principles of transparency and fairness, in respect of ethical principles and values and the general canons of fairness and diligence.

This code, approved by the Management of MCF Safety Belts S.r.l. is accessible on the company website <https://www.safetybelts.it/>.

1.2 THE RELATIONSHIP WITH STAKEHOLDERS

The Code aims, in particular, to direct the company's conduct towards cooperation and trust towards stakeholders, i.e. those categories of individuals, groups and institutions whose contribution is necessary for the realisation of the company's mission and/or whose interests are directly or indirectly influenced by the activity of MCF Safety Belts S.r.l.

Therefore, a personal commitment to respect the law, honesty, loyalty towards the Company and transparency is required.

1.3 THE VALUE OF CORPORATE REPUTATION AND RELIABILITY

Reputation and reliability are fundamental intangible resources. Good corporate reputation and reliability promote investments, relations with local institutions, customer loyalty, the development of human resources, and the fairness and reliability of suppliers.

In the performance of any business activity, unethical behaviour compromises the relationship of trust between the Company and its stakeholders. For this purpose, it is not ethical and encourages, on the contrary, the development of hostile and non-transparent behaviour towards MCF Safety Belts S.r.l., the conducts and attitudes of anyone, individual or organisation, which belongs to or collaborates externally with the Company, trying to procure an undue advantage or interest for itself.

By unethical conduct, we mean both those that violate legal regulations and those that conflict with internal regulations and procedures.

1.4 CONTRACTUAL VALUE OF THE CODE

The observance of the rules of the Code must be considered an essential part of the contractual obligations of the employees of the company in accordance with and to the effects of Articles 2104, 2105 and 2106 of the Civil Code.

A severe and persistent violation of the rules of this Code harms the relationship of trust established with the company and may lead to disciplinary action and compensation for damages, without prejudice, for employees, to compliance with the procedures set out in Article 7 of Law 300/1970 (Workers' Statute) and in the national collective labour agreement.

1.5. UPDATING AND STRUCTURE OF THE CODE

By decision of the Management Council, the Code may be amended and supplemented, also based on suggestions and indications from the Supervisory Board.

This Code of Ethics is structured in six parts:

- PART I, dedicated to general dispositions, in which the nature, scope and addressees of the Code of Conduct are indicated;
- PART II, which explains the reference ethical principles, i.e. those values considered fundamental by the Company, which all Addressees must adhere to and be inspired by in the pursuit of the company purposes
- PART III, which sets out the rules of conduct, with which those operating in MCF Safety Belts S.r.l. must comply in the performance of their activities;
- PART IV, describes the tools to guarantee the effectiveness and application of the Code of Conduct;
- PART V, provides the control mechanisms for the implementation of the Model and the Code of Conduct;
- PART VI, concerning final dispositions.

PART I "GENERAL DISPOSITIONS"

ART. 1 – NATURE OF THE CODE OF CONDUCT

1. This Code of Conduct (hereafter also the 'Code') has been established, pursuant to Legislative Decree No. 231 of 8 June 2001, to set out, together with the Organisation, Management and Control Model, a set of measures and procedures suitable for reducing the risk of commission of crimes within the company organisation.

2. The Code is also adopted in order to ensure that the ethical principles, on the basis of which MCF Safety Belts S.r.l. operates, are clearly highlighted as an essential foundation of the company culture and behaviour. They must therefore inspire the activity of all those who work for the Company, always keeping in mind the roles, functions and responsibilities assigned to them for the realisation of the corporate purposes.

ART. 2 – FIELD OF APPLICATION AND ADDRESSES

1. This Code applies to all persons defined as 'Addressees'.

2. They are considered 'Addressees' and are therefore obliged to comply with the provisions of this Code of Conduct in the parts applicable to them:

- a) the employees;
- b) managers;
- c) directors;
- d) all those who, directly or indirectly, permanently or temporarily, work for the Company (in particular external collaborators and consultants, suppliers).

PART II

“ETHICAL PRINCIPLES”

ART. 3 – LEGALITY AND RESPONSABILITY

1. In the realisation of the company mission, the behaviour of all addressees of this Code must be inspired by the ethics of responsibility. The Addressees must know and respect the laws and regulations in force in all the countries in which MCF Safety Belts S.r.l. operates. In no case may the interests of the Company be pursued or realised in violation of the laws.
2. At the same time, the Company undertakes to constantly train and sensitise Addressees on the provisions of the Code of Conduct and on the sanctions arising therefrom.

ART. 4 – PRINCIPLE OF LOYALTY

1. The Company has established a relationship of mutual trust and loyalty with each Addressee working for its company. Therefore, the respect of the rules of this Code of Conduct must be considered by the Addressees as an essential part of their obligations towards the Company.
2. In particular, with regard to the duty of loyalty, employees are prohibited to:
 - a) have subordinate employment relationships, consultancy assignments and self-employment collaborations with third parties during the persistence of the contractual relationship, if these are in conflict of interest or incompatible with the activities carried out for MCF Safety Belts S.r.l., unless the Company has authorised them in writing;
 - b) to carry out activities incompatible with their official duties or otherwise contrary to the interests of the Company.

ART. 5 – VALUE OF THE INDIVIDUAL

1. The Company promotes a use of human resources that respects and values individual characteristics, protects diversity and is based mainly on the use of dialogue and listening, with a view to favouring professional development and growth.
2. All Addressees of this Code, in the pursuit of the company's aims, must respect the dignity of persons and their privacy. Molestations and offences of any kind are not tolerated. They must also maintain a climate of mutual respect within the company.

ART. 6 – FAIRNESS, LOYALTY AND COOPERATION

- 1 The behaviour of the Addressees must be marked by respect for the principles of fairness, loyalty and cooperation, which constitute the fundamental principles for promoting alignment with the mission and core values of MCF Safety Belts S.r.l. (winning mentality, teamwork based on trust, honesty, integrity and sincerity, attention to others and positive attitude).
- 2 The Addressees of this Code must carry out their activities in compliance with the principles of conduct indicated. The principle of fairness involves the respect of the rights, also from the point of view of privacy and opportunities, of all subjects involved in working and professional activities. MCF Safety Belts S.r.l. therefore undertakes to act in a fair and impartial manner, adopting the same behaviour towards all the interlocutors with whom it comes into contact, even in the different forms of relation and communication required by the nature and institutional role of the different interlocutors.
- 3 In its relations, the Company promotes the principle of caring about people and demands that no molesting behaviour takes place that could lead to:
 - a) create a hostile working environment;
 - b) unjustifiably interfering with the work of others;
 - c) creating obstacles/impediments to the professional growth of others.

ART. 7 – IMPARTIALITY AND THE PRINCIPLE OF NON-DISCRIMINATION

1. In the relations with its interlocutors, both internal and external, the Company undertakes to avoid any discrimination:
 - a) Age, gender, sexual orientation, health status, disability, language, ethnicity and nationality;
 - b) Personal, political, philosophical or religious convictions;
 - c) Membership or non-membership of a trade union association; possible withdrawal from it.

ART. 8 – CONFLICT OF INTERESTS

1. Conflict of interest is defined as:

- a) Any situation in which the pursuit of self-interest is in conflict with the interests or purposes of the company;
- a. Any situation in which any Addressee may take advantage or improper profit from opportunities known in the course of its business activities.

2. The Addressees of this Code must always act with honesty and integrity, avoiding situations or activities in which they are or may appear to be in conflict of interest in personal and professional relationships.

3. In the hypothesis that an Addressee is in a situation of conflict of interest, he/she must abstain from taking or participating in decisions/ deliberations relating to the matter to which the conflict relates, expressly declaring his/her situation and obtaining, if necessary, a written declaration in compliance with the Guidelines for Business Conduct (Revised 2022).

ART. 9 – HEALTH AND SAFETY

1. The Company undertakes to scrupulously comply with the regulations on health and safety and to enforce them in the workplace.

2. In order to preserve the health, safety and physical integrity of the Addressees, the Company undertakes to consolidate and disseminate the culture of safety, developing a greater awareness of risks and recognition of danger, and promoting responsible individual behaviour.

3. MCF Safety Belts S.r.l ensures the maximum cooperation of its collaborators and employees towards the Prevention and Protection Service and anyone who, having the right to do so, intends to inspect and check the workplace and its facilities.

ART. 10 – ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

1. MCF Safety Belts S.r.l is committed to acting in compliance with current environmental protection regulations. The Company is aware of environmental issues and therefore operates to:

- a) apply the best available technologies and minimise the environmental impacts caused, directly or indirectly, by the operation of its production systems;
- b) develop their activities, optimising - where possible - the use of natural resources;
- c) preserving the surrounding environment, adopting - where possible - eco-efficient technologies.

2. The Company requires that the Addressees of this Code, involved in operational processes that may have environmental repercussions, carry out their work conscientiously and in compliance with the regulations in force.

ART. 11 – INFORMATION CONFIDENTIALITY

1. MCF Safety Belts S.r.l, by conforming to the requirements on the protection of personal data ,provided by the European Regulation 2016/679 ('GDPR'), Legislative Decree 30/06/2003 no. 196 ('Privacy Code') as amended and supplemented by Legislative Decree 101/2018, and subsequent amendments and additions, guarantees that the processing of personal data and confidential information, collected and stored by the Company, is directed exclusively to carry out the purposes pertaining to the exercise of its activity.

2. The addressees of this Code undertake to act in accordance with the Company's Data Security Policy and to protect the confidentiality of personal data collected and processed.

ART. 12 – PROTECTION OF CORPORATE ASSETS

1. In order to perform their duties, each Addressee is directly and personally responsible for the goods and resources entrusted to them.
2. Company goods must always be used in compliance with the laws in force, with this Code and with the requirements of functionality and efficiency, as well as with diligence and with a responsible and protective conduct, avoiding their misuse by third parties.
3. It is forbidden, by using information systems, to interfere with one's own or others' productivity, or to access sites unrelated to work activities.
4. In order to protect intellectual and industrial property, MCF Safety Belts S.r.l. also requires that each Addressee respect the confidentiality of the strategic choices adopted by the Company and its scientific, productive and commercial knowledge.
5. In particular, all Addressees undertake to maintain the maximum confidentiality on every aspect of MCF Safety Belts S.r.l.'s activity, on the contents of documents and on all information, they have come to know as a result of their relationship with the Company, including, purely by way of example and not limited to, information concerning employees, customers and products.

ART. 13 – PROTECTION OF THE NAME AND LOGO

1. The Addressees of this Code of Conduct must not commit actions that could endanger or compromise the values, image and good name of the Company.
2. All Addressees are also required to avoid any use of the name and logo of MCF Safety Belts S.r.l. in a manner that does not comply with the company purposes and that may in any case damage the prestige and good name of the Company.
3. It is forbidden for Addressees to use the name/brand/logo of the Company without express formal authorisation (licence, letter of authorisation, specific contractual agreement, etc.).

ART. 14 – GIFTS, GIVEAWAYS AND BENEFITS

1. MCF Safety Belts S.r.l. in the pursuit of its corporate aims, believes that the set of ethical principles and values expressed up to now in this Code should inspire the activity of all those who work in the Company. Therefore, employees may not in any way request, accept and/or offer gifts, giveaways and benefits from/to third parties in order to obtain or grant an advantage.
2. On the other hand, the Company admits the possibility of receiving or offering gifts, giveaways or benefits of modest value in accordance with commercial custom, which are not capable of influencing the judgement and actions of employees and/or third parties.

ART. 15 – EFFICIENCY

1. The principle of efficiency requires that in every work activity, the economic management of the resources employed in the performance of business processes is realised, and a commitment is made to offer products that are appropriate to the needs of customers and according to the most advanced standards.
2. MCF Safety Belts S.r.l. is committed to constantly guaranteeing the effectiveness and efficiency of the company processes, through the preparation and observance of programmes for the continuous improvement of the quality of the products supplied through the adoption of technological and organisational solutions aimed at combining the satisfaction of its Customers' needs with management efficiency and economy.

ART. 16 – SPIRIT OF SERVICE

1. The principle of the spirit of service means that each addressee of the Code must always be committed, in his or her behaviour, to cooperation and sharing the company mission.

ART. 17 – ENHANCEMENT OF HUMAN RESOURCES

1. Human resources represent a fundamental factor in the company's development. Therefore, MCF Safety Belts S.r.l. protects and promotes their professional and personal growth in order to increase the heritage of skills owned and improve the quality of their lives.

ART. 18 – INTERNAL CONTROL SYSTEM

1. In compliance with the regulations in force and with a view to the planning and management of company activities aimed at efficiency, correctness, transparency and quality, MCF Safety Belts S.r.l. adopts organisational and management measures suitable to prevent unlawful behaviour or in any case behaviour contrary to the rules of this Code by any person acting for the company.

In relation to the extent of the delegated powers, the Company implements organisation, management and control Models that provide for suitable measures to guarantee the performance of activities in compliance with the law and the rules of conduct of this Code, to discover and promptly eliminate risk situations.

2. A special Supervisory Board is established for the verification and enforcement of the rules contained in this Code.

The Supervisory Board assists the Executive Committee in setting and updating the guidelines of the internal control system, in assessing the adequacy and effective functioning of the same, and in analysing corporate risks, and performs the further tasks subsequently set out in this Code.

3. In order to prevent the risk of commission of crimes, from which the liability of the Company may derive pursuant to Legislative Decree No. 231/2001, the Organisational Models provide that all the company activities, referable to the main processes and support processes, are identified as activities in the scope of which crimes may be committed; the responsibilities referring to the implementation and relative control are defined; and the Audit functions are assigned to the Supervisory Board, to which reports, any violations, and the results of verifications are reported.

4. The Supervisory Board periodically verifies the adequacy and effective functioning of the internal control system and carries out the interventions considered necessary and appropriate to ensure its better functioning.

This system is supported by the control activities carried out by the individual functions with respect to the processes and activities falling within their competence and by the activity of the Audit functions assigned to the Supervisory Board within their specific competences.

They have the task of assessing and contributing to the improvement of risk management and governance processes, verifying the internal control system in terms of effectiveness and efficiency of operations, safeguarding the company's assets as well as compliance with laws, regulations and internal procedures.

ART. 19 – RELATIONSHIP WITH MEMBERS

1. MCF Safety Belts S.r.l, aware of the importance of the role played by the shareholder, undertakes to provide accurate, truthful and timely information and to guarantee the conditions of his participation, within the scope of his prerogatives, in corporate decisions.

2. It is the company's commitment to protect and increase the value of its business, against the commitment made by the shareholder with its investments, through the valorisation of management, the pursuit of high standards in the use of production and the solidity of its assets. The company also undertakes to safeguard and protect the company's resources and assets.

3. In particular, the company undertakes to ensure the regular participation of directors in shareholders' meetings as well as to guarantee the orderly and functional proceedings of the meetings, respecting the fundamental right of shareholders to request clarifications on the various topics under discussion and to express their opinion.

PARTE III
“RULES OF CONDUCT”

CAPO I
“RELATIONS WITH STAFF”

ART. 20 – PERSONAL RECRUITMENT AND WORKING ENVIRONMENT

1. The personnel recruitment process is carried out with respect for equal opportunities, rejecting any form of nepotism, favouritism or clientelism.
2. The recruitment process is based exclusively on the correspondence of the candidates' professional and aptitude characteristics to the job profile sought; people are recruited, taking into account their experience, aptitude and competence.
3. Staff is hired with a regular employment contract, in compliance with the regulations in force and the National Collective Labour Agreement for the Mechanical Engineering and Plant Installation Industry in force; no form of irregular employment is allowed.
4. At the time of the establishment of the employment relationship, the newly hired employee shall be provided with accurate information on
 - a) functions and duties to be performed
 - b) normative and remuneration elements;
 - c) rules and procedures to be adopted in the performance of work activities.
5. The company is committed to protecting the moral and physical integrity of its workers; to this end, it promotes responsible and safe behaviour and adopts all the safety measures required by technological evolution to guarantee a safe and healthy working environment, in full compliance with the regulations in force on prevention and protection.
6. In particular, for the management of aspects relating to health and safety in the workplace, the Company has adopted and implemented an Organisational and Management Model in compliance with Article 30 of Legislative Decree 81/2008, implementing a Workplace Health and Safety Management System.
7. MCF Safety Belts S.r.l is committed to guaranteeing the respect of the conditions necessary for the existence of a collaborative working environment that is not hostile and free of any discriminatory behaviour regarding race, religion, sex, political and trade union opinions, sexual inclinations, age, origin, handicap or other factors.
8. Employees who believe they have been subjected to discrimination or who are aware of or suspect any of the violations provided for by the Whistleblowing legislation may make a report in the manner described in the MCF Safety Belts S.r.l. Whistleblower Policy.
9. MCF Safety Belts S.r.l will take appropriate disciplinary measures against those who assume intimidating or discriminating attitudes or retaliatory conduct against anyone who reports violations under the above Whistleblower Policy.
10. The company requires the cooperation of everyone in order to maintain a climate of respect for the dignity, honour and reputation of each individual. To this end, it activates periodic surveys on the company climate and strives to constantly improve it. Harassment of any kind is not permitted in labour relations.
11. Other forms of behaviour prohibited, as they would have a negative impact on the working environment include, but not limited to, the following
 - a) threats
 - b) violent behaviour
 - c) possession of weapons of any kind
 - d) use of recorders, including video telephones or cameras for purposes other than those approved by line managers
 - e) use, distribution, sale or possession of drugs or other narcotic substances, which are not taken for medical reasons.

Furthermore, the worker shall not remain on the MCF Safety Belts S.r.l premises or in an MCF Safety Belts S.r.l work environment if he/she is under the influence of alcoholic beverages or drugs or other narcotic substances taken not for medical use.

ART. 21 – TRAINING AND EVALUATION OF EMPLOYEES

1. MCF Safety Belts S.r.l provides all workers with information and training plans in order to enhance the specific skills and implement the professional value of employees.
2. The Company plans training based on specific professional development needs, i.e. taking into account the career path and the specific needs of the company and of individual functions.
3. The Managers of each business area periodically assess the performance of their direct reports and, if they identify any areas for improvement, take appropriate action.

ART. 22– OBLIGATIONS AND DUTIES OF EMPLOYEES

1. Each employee must act in accordance with fairness, loyalty and integrity in the performance of his or her work activities, respecting the duties subscribed to in his or her employment contract and those deriving from current legislation, this Code of Ethics and the company regulations. They must also base their conduct on mutual respect and cooperation.

2. The Company requires its employees to avoid any situation of conflict of interest and to declare any interest they may have, on their own behalf or on behalf of third parties, in a given Company transaction, and to comply more specifically with the relevant regulations on conflict of interest and Group policies. All Company representatives, more generally, must ensure that corporate decisions are always taken in the interest of the Company itself and must provide adequate information in the event that they have a concurrent personal interest.

3. The Company requires employees to maintain the utmost confidentiality on corporate information of which they become aware, as well as on information, of whatever nature or form, gathered or processed in the performance of their work activities; they are also required not to disclose it without authorisation, unless required to do so for legal reasons.

To this end, employees

- a) must exercise due caution in the use of information acquired in the course of their work;
- b) must not use the information either obtained for personal advantage or in a manner that is against the law or that is or may be detrimental to the purposes and values of the Company.

4. Anyone involved in a Report or in the investigation of an alleged violation under the Whistleblowing legislation is required to maintain the utmost confidentiality on the identity of the Whistleblower, of the persons involved and on the contents of the Report, with the exceptions provided for by law, in accordance with the Whistleblower Policy of MCF Safety Belts S.r.l.

5. Managers of company areas or, in any case, all those who have management functions and/or responsibilities towards employees are expressly forbidden to abuse their hierarchical position. In particular, by way of example:

- a) must not offer favourable treatment or determine situations of privilege;
- b) must not obtain advantages for themselves or others by abusing their decision-making and management power;
- c) must reject undue pressure.

CAPO II
“RELATIONS WITH THE PUBLIC ADMINISTRATION”

ART. 23 – LEGALITY AND IMPARTIALITY

1. In relations with the Public Administration, all activities and negotiations conducted by employees or external collaborators/consultants of the Company, competent according to the Company's internal rules, shall be characterised by the utmost respect for honesty, transparency, clarity, fairness, good faith and legality, to protect the Company's reputation and image.

2. Employees and collaborators in dialogue with the Public Administration, in the performance of their duties, must in no way impair the impartial judgement of the latter's representatives. Therefore, by way of example

- a) the employee/collaborator must refrain in the event of a conflict of interest from dealing with the Public Administration or its representative, declaring any conflict situation, even if only apparent or potential;
- b) it is forbidden to mislead or alter the analysis and decision-making capacities of the representatives of the Public Administration through the production of social documents that do not represent true facts.

ART. 24– BUSINESS NEGOTIATIONS

1. If the Company's employees or collaborators follow any business negotiation, tender or institutional relationship with the Public Administration or its representative, they must operate in compliance with the law and proper business practice, by avoiding improperly influencing the decisions of the counterparty and those of the officials.

2. By way of example and without limitation, the following conduct is forbidden, where it is aimed at obtaining an undue advantage for the Company or damaging the public interest or integrity of the public administration or the Company:

- a) obtaining or soliciting the obtaining of confidential information in order to win a tender for obtaining a contract;
- b) advantage personally representatives of the Public Administration by proposing employment and/or business opportunities to them for the same purpose
- c) induce representatives of the Public Administration to commit acts contrary to the duties of their office in the handling of a specific business for the benefit of the Company
- d) refuse to give or alter information that the Public Administration has requested in the performance of its inspection function.

ART. 25 – CONTRIBUTIONS, SUBSIDIARIES AND PERMITS

1. The Company prohibits the obtaining, from the Public Administration or other Public Entity, any type of financing, contribution, permit or authorisation to carry out activities, using documents and/or declarations that have been altered or do not correspond to the truth, or by means of omitted information or through artifice or deception, which could mislead the granting body/authorisation.

2. Furthermore, it is forbidden to divert or allocate a loan, grant or contribution, obtained from the Public Administration or another Public Entity, to purposes other than those for which they were granted.

ART. 26 – GIFTS, GIVEAWAYS, SPONSORSHIPS

1. The Company condemns any conduct, carried out by the Addressees of this Code, consisting in promising or offering, directly or indirectly, money or other benefits to representatives of the Public Administration or to their family members and relatives, in order to obtain, even potentially, an interest or advantage for the Company.

CAPO III "RELATIONS OF SUPPLIERS"

ART. 27 – CHOICE OF SUPPLIER

1. The choice of suppliers shall be made exclusively based on the criteria of competitiveness, quality, cost-effectiveness and price, as well as the ability to supply and guarantee products and services of an adequate level.

No discriminatory practices shall be implemented during the choice of the contractor.

2. In particular, the Company shall take measures to put in place the necessary procedures to guarantee transparency criteria during the supplier choice process, so that reasonable competition between suppliers is safeguarded.

ART. 28 – TRANSPARENCY, GOOD FAITH, FAIRNESS, DILIGENCE IN THE EXECUTION OF CONTRACTS AND FREE COMPETITION

1. Relations with suppliers are based on the principles of transparency, good faith, fairness and free competition. Therefore, employees, in the performance of activities involving supply relationships, shall

- a) comply with the regulations in force and the contractual conditions required;
- b) comply with the Company's internal procedures concerning the management of relations with suppliers;
- c) have a transparent and complete correspondence with suppliers
- d) not be subjected to any form of conditioning by suppliers, when making decisions or performing acts relating to their work.

2. The Company and the supplier must operate in order to build a collaborative and mutually trusting relationship. MCF Safety Belts S.r.l. undertakes to inform the supplier in a correct and timely manner about the characteristics of the activity requested of it, the forms and times of payment in compliance with the regulations in force in consideration of the commitments undertaken by the Company with its customer.

ART. 29 – KNOWLEDGE AND OBSERVANCE OF THE CODE OF CONDUCT

1. The content of this Code of Conduct must be brought to the knowledge of the suppliers by the Company, also through the signing of a specific contractual clause, which commits them to comply with the principles stated herein.

2. The performance of conduct contrary to the principles expressed by the Code of Conduct is considered by the Company to be a serious breach of the duties of fairness and good faith and a cause of damage to the relationship of trust. Consequently, should such behaviours occur, MCF Safety Belts S.r.l. may decide to terminate contractual relations for good cause.

CAPO IV "RELATIONS WITH EXTERNAL COLLABORATORS AND CONSULTANTS"

ART. 30 – FAIRNESS, GOOD FAITH AND LOYALTY

1. The Company requires that collaborators in any title and consultants of the Company behave, in the performance of the contractual relationship established with the latter, with fairness, loyalty and good faith. They must comply with the provisions of this Code and the instructions and prescriptions issued by the Company, insofar as they apply to them.

ART. 31 – KNOWLEDGE AND OBSERVANCE OF THE CODE OF CONDUCT

1. The content of this Code of Conduct must be brought to the attention of collaborators in any title and consultants by the Company, including through the signing of a special contractual clause, which commits them to the observance of the principles enshrined in it

2. Engaging in conduct contrary to the principles expressed in the Code of Conduct is considered by the Company to be a serious breach of the duties of fairness and good faith and grounds for damage to the relationship of trust. Consequently, in the event that such behaviours occur, MCF Safety Belts S.r.l. may decide to terminate contractual relations for good cause.

CAPO V "CUSTOMER RELATIONS"

ART. 32 – TRANSPARENCY AND FAIRNESS

1. The Company imprints its relationships with customers to the maximum transparency and fairness and always manages them in compliance with current regulations.
2. In order to enable customers to make an aware and rational choice, the Company gives clear and truthful information about the products it offers. In particular, in relations with customers, Addressees shall:
 - a) To comply with the applicable regulatory provisions;
 - b) observe internal procedures for managing customer relations;
 - c) refrain from disparaging evaluations of competing products;
 - d) facilitate the customer's formation of informed choices regarding products by providing adequate information.
3. The Company undertakes to satisfy its Customers in fulfilment of the obligations related to the relative contractual relationship; the company also undertakes not to engage in discriminatory behaviour towards its Customers that restricts the freedom of private economic initiative or contractual autonomy. MCF Safety Belts S.r.l establishes with Customers a relationship characterized by high professionalism and marked by availability, respect, courtesy, research and the offer of maximum cooperation.
4. The satisfaction of its Customers represents a fundamental objective for MCF Safety Belts S.r.l and, to this end; the Company is committed to ensuring the quality of the products supplied. MCF Safety Belts S.r.l undertakes to adopt towards all Customers a style of behaviour marked by efficiency, cooperation and courtesy, providing, in a clear and transparent way, accurate, complete and truthful information about the characteristics of the products offered, using a simple and understandable language.

ART. 33 – CONTRACTS AND COMMUNICATIONS

1. Contracts and communications with Customers must be:
 - a) clear and simple, formulated in the closest possible language to that of widespread customers;
 - b) in accordance with applicable regulations.
2. The company undertakes to communicate promptly and in the most appropriate manner, any information regarding any changes and variations in the performance of the product offered.

ART. 34 – CUSTOMER SATISFACTION

1. The company is committed to facilitating interaction with customers through the prompt handling and resolution of any complaints and/or by making use of appropriate communication systems.
2. MCF Safety Belts S.r.l repudiates litigation as a tool aimed at obtaining undue advantages and resorts to it exclusively when its legitimate claims do not find due satisfaction in the interlocutor.
3. The company, in order to achieve systematic listening to the Customer, prepares periodic Customer Satisfaction surveys, as a source of information to identify and verify the objectives of improving the level of the product.

ART. 35 – PRODUCT QUALITY

1. In order to ensure maximum Customer satisfaction, the Company is committed to achieving and maintaining high quality standards in the products offered.
2. Adequate control mechanisms are provided by the Company in order to ensure maximum compliance with regulations on product safety and quality.
3. Control mechanisms are also ensured by the Company in order to avoid the delivery of a different product, from that stated or agreed.

PART IV
“EFFECTIVENESS OF THE CODE OF CONDUCT”

ART. 36 – SPREADING OF THE CODE OF CONDUCT

1. MCF Safety Belts S.r.l undertakes to disseminate this Code and its possible updates to the Addressees through the methods deemed, from time to time, most appropriate, such as, for example:

- a) transmission by e-mail to the Company's external collaborators/consultants with a request for them to sign a declaration of receipt, acknowledgement and commitment to comply with the relevant principles;
- b) publication on the company website;
- c) posting on the company notice board, pursuant to Article 7, paragraph 1 of Law No. 300/1970;
- d) insertion in all contracts stipulated with suppliers of a clause informing them of the existence of this Code of Conduct, so that they may accept it and undertake, insofar as applicable to them, to respect the principles and rules of conduct contained herein
- e) preparation of specific training/information plans differentiated according to the corporate role-played by the addressee, which divulges the principles and rules of conduct on which the Company's activities are based.

ART. 37– CODE OF CONDUCT AND SANCTIONS

1. The Company considers the observance of the rules of this Code to be an integral and essential part of the duties belonging to the Recipients. Violation of the behavioural or procedural rules of the Code of Conduct constitutes non-compliance with the aforementioned obligations and may result in a sanctions and/or disciplinary procedure against those responsible.

2. Recipients who make complaints containing false and/or unfounded information and made for retaliatory, vexatious and/or malicious purposes or made in order to damage the image of the presumed author of the complained act may also be subject to a sanctioning and/or disciplinary procedure.

3. In the above-mentioned cases, sanctions may be imposed, including disciplinary sanctions, graduated and proportionate with respect to the type of violation of the Code and complying, depending on the category to which the Recipient author of the violation belongs (whether employee, director, auditor or auditor, external subject, member of the Supervisory Board), with the provisions of the CCNL or applicable contract.

PART V
“METHODS OF IMPLEMENTATION AND CONTROL”

ART. 38 – ESTABLISHMENT OF THE SUPERVISORY BOARD

1. MCF Safety Belts S.r.l has established internally the Supervisory Board, with the task of supervising the implementation of and compliance with this Code of Ethics and the Model of Organization, Management and Control, referred to in Legislative Decree 231/2001, implemented consistently with the Code itself. In particular, the Supervisory Board:

- a) is responsible for expressing binding opinions regarding ethical issues that may arise in the context of business decisions and alleged violations of the Code of Conduct reported to it by Managers;
- b) must follow up on the periodic review of the Code of Conduct and its implementation mechanisms, including through the presentation of proposals for adjustments;
- c) is responsible for setting and approving the ethics communication and training plan.

2. The Supervisory Board is a body endowed with independence, full autonomy of action and control, whose activity is characterized by professionalism and impartiality, to which this position is assigned through a special deliberative act of the Board of Directors.

3. The members of the Supervisory Board remain in charge as established by the act of appointment of the Board of Directors and may be dismissed by the Board only for good cause.

ART. 39 – AUDIT FUNCTIONS

1. Audit functions are assigned to the Supervisory Board. This Body prepares the audit calendar may delegate external professionals or company managers/experts to perform the same. Company Area Managers who receive any reports, coming from the relevant structure, of possible violations of the Code of Conduct shall report to the Supervisory Board. The Supervisory Board has free access to data, documentation and information useful for carrying out its activities.

Company Area Managers are required to cooperate actively in carrying out the above activities.

ART. 40 – WHISTLEBLOWING

1. The Company, in its effort to contrast unlawful activities and constantly improve the corporate culture characterized by correct behaviour, has adopted the Whistleblower Policy that describes the procedures for reporting violations and/or unlawful acts (so-called Whistleblowing) in accordance with current regulations and works to enable well-intentioned whistleblowers wide protection and confidentiality.

2. The Company therefore:

- a) has implemented internal channels for reporting violations and/or unlawful acts;
- b) has entrusted the handling of reports to an autonomous, dedicated, specifically trained person with the necessary skills to follow up on the reports received;
- c) maintains the closest confidentiality on the reports received;
- d) prohibits any form of retaliation or discrimination against reporters;
- e) guarantees the protection of the authors of reports from any act of retaliation or discrimination they may face for having made the report and keeps their identity confidential, without prejudice to legal obligations;
- f) also protects the facilitators, persons related to the reporter by a stable affective or family relationship within the fourth degree, who work in the same work context; the reporter's co-workers; Entities owned by the reporter or operating in the same work context as the reporter; the anonymous reporter, if subsequently identified and subject to retaliation;
- g) apply appropriate sanctions against those who violate the measures for the protection of the reporter, those who also violate the obligation of confidentiality related to the person involved and/or mentioned in the report;
- h) applies disciplinary measures and/or sanctions, or judicial initiatives in the case of reports that prove to be unfounded or opportunistic, whether they come from internal or external channels. The reporter who has made the Report in Good Faith shall not be sanctioned.

PART VI “FINAL DISPOSITIONS”

ART. 41 – ADOPTION OF THE CODE OF CONDUCT

1. The adoption of this Code was approved by the Board of Directors on 31.01.2024.