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<p>General</p>	<p>The organization has issued this document, in line with its policy, with the purpose of regulating the Behavior and Action Principles, which should control the activities of all Directors, Managers, and all Employees and Coworkers of the Company. The implementation of these principles is an essential condition to be part of UniFor S.p.A.</p> <p>As evidence of the ethical and moral principles illustrated in this document, UniFor S.p.A. performs annual voluntary donations to entities and associations operating in the social field and medical research.</p>
<p>The Importance of Continuous Improvement</p>	<p>UniFor S.p.A.'s ethical principles are based on the Company's continuous improvement of health and safety conditions in the workplaces. This is a crucial aspect in the systemic management of the Company. It facilitates the reduction the impact of undesired events (e.g. near-misses, accidents, injuries) to the advantage of better work efficiency. The direct consequence of this is evident in the Company's daily activities, where operators can work in a healthy environment, in the certainty of the constant control of existing risks, resulting in better reliability and quality. Therefore, the observance of this Ethical Code and Organization Model to work in a healthier and safer environment is absolutely crucial.</p>
<p><b>Behavior Principles</b></p>	<p>The following Behavior Principles are the cornerstone that all our coworkers cannot avoid, to work with passion, enthusiasm, and positive energy.</p>
<p>Professional Commitment</p>	<p>This is necessary to allow all internal and external staff to exercise their skills, rely on their experience, improve through time, and comply with their assigned tasks. An appropriate professional commitment is crucial to achieve the Company's Health and Safety objectives.</p>
<p>Respect of People</p>	<p>The performance of Company's activities cannot disregard the professional and individual development of every person. For this reason, everybody should work with consistency, transparency, and responsibility, supporting team work, expressing their positive contributions. UniFor S.p.A. achieves its objectives working in a healthy environment, with total respect for all operators.</p>

Integrity	Reliability, professional attitude, and respect for honesty are the basis for the foundation of professional activities of internal and external staff. Dedication to the individual job should not pursue personal interests and should be the result of UniFor S.p.A.'s common objectives.
Loyalty	It requires rectitude and fairness in the relationships with managers, supervisors, colleagues, junior workers, and external staff. It implies the observance of UniFor S.p.A.'s provisions and internal rules with transparency attitudes towards all people and in all instances.
Participation	It is based on the sense of responsibility of every person, in their professional context, to exclude individualistic behavior, and support and enhance team work and mutual contributions. We refuse the use of management or operational modes that enhance personal satisfaction. This is in compliance with UniFor S.p.A.'s interest.
<b>Action Principles</b>	UniFor S.p.A. also intends to define the action principles governing the activities of all directors, managers, and employees in the performance of their functions. The target is to be competitive in the market, offering very high quality products, working with economic sensitiveness, in the observance of Law, and respect for the environment and health and safety in the workplace. We plan our activities and control their results with the observance of transparent principles in accounting, administration, and company responsibilities
Observance of Law	UniFor S.p.A. implements the laws, regulations, and rules applicable to its context, in order to achieve the quality, health, and safety objectives set forth by the Company. Within the Company, an information system is implemented, aimed at informing the employees about legislative implications connected with its activities. In particular, UniFor S.p.A. prohibits deliberately taking advantage from any gaps of laws and rules, if the result is a lack of compliance with the Company's rules. Moreover, the Company has established the tools and resources required for the training of employees in relation to the provisions of the law.

<p>Observance of Health and Safety Rules in the Workplace</p>	<p>The organization defines a policy to ensure the best possible protection of health and safety in the work environment, and prevention from all potential risks for the purpose of ensuring continuous improvement.</p> <p>This policy is applied without favor to the Company's employees and the employees of external businesses, where those external businesses are engaged within the Company's sites. To develop and check the compliance with Health and Safety management, the Company implements a system that refers to the shared and updated Risk Assessment Document, which is regularly checked and certified by independent third parties. The Risk Assessment Document refers to international standards (BS OHSAS 18001), national guidelines (Guidelines UNI INAIL 2001), and Quality, Environment, and Safety Policy adopted by UniFor S.p.A.</p> <p>All employees, coworkers, and third parties shall carefully comply with all measures required by UniFor S.p.A.'s procedures and internal regulations in the field of Health and Safety in the workplace, developed and updated in compliance with the current legislation. In particular, everyone is required to provide supervisors with comments related to dysfunctions or possible improvements.</p>
<p>Respect for the Environment and Communities</p>	<p>The organization actively promotes environmental protection. UniFor S.p.A. has always strived for preventing the risks for local populations and the environment not only in accordance with applicable legislations, but also taking into account the development of scientific research and best practices in the field.</p> <p>UniFor S.p.A. intends to ensure that its investments and development are environmentally sustainable, with the respect of local communities.</p>
<p>Relationships with Suppliers</p>	<p>The signature of a contract with a supplier must always be based on extremely clear relationships, avoiding any dependence.</p> <p>The selection of suppliers and purchase of goods and services are carried out on the basis of objective evaluations of competitiveness, quality, and compliance with technical/professional requirements, cost-effectiveness, price, integrity, and reliability of suppliers. The selection of contractors and service providers must be carefully managed, in order to ensure the fulfillment of all obligations in the fields of health and safety in the workplace, with special reference to coordination activities. Furthermore, UniFor S.p.A. has business relations only with businesses that follow the same principles of environmental rules, in accordance with applicable legislation in this context.</p>

Relationships with Customers	<p>Fairness and respect for customers play a key role in defining the Company's objectives. The relationships with Customers must be based on mutual trust and satisfaction. In particular, the commitment to give Customers very high quality and long-lasting products beyond their expectations is guaranteed. This is the only way to remain competitive in the market.</p>
Protection of Business Information	<p>All staff have to know and implement the provisions of business policies in the field of safety of information, including electronic information, to ensure its integrity, confidentiality, and availability. All information obtained from staff in relation to their activity is the property of UniFor S.p.A.</p> <p>All information is processed by UniFor S.p.A. in full respect of confidentiality and privacy of people involved, in compliance with applicable legislation. In particular, the Company:</p> <ul style="list-style-type: none"> <li>• has defined an organization for treatment of information ensuring proper separation of roles and responsibilities;</li> <li>• requires that third parties involved in processing of information to sign confidentiality agreements;</li> <li>• has appropriate and specific training modules.</li> </ul>
Protection of Business Property	<p>All staff have to work diligently to protect the Company's tangible and intangible assets, through responsible behavior and in line with operating procedures set forth to regulate their use and precisely documenting their use. In particular, all staff shall:</p> <ul style="list-style-type: none"> <li>• Use all assets assigned to them with care and prudence;</li> <li>• Avoid any improper and/or personal use of the Company's assets, which may cause damage or efficiency reduction or, anyhow, in contrast with the Company's interest.</li> </ul> <p>As for IT applications, all staff shall:</p> <ul style="list-style-type: none"> <li>• Carefully implement the provisions of the Company's safety policies, in order not to affect the functionality and protection of IT systems;</li> <li>• Read, understand, and accept the provisions of the "IT Data Management" rules established by UniFor S.p.A.;</li> <li>• Not go to websites whose contents are degrading, offensive, and anyhow not in the interest of their activity.</li> </ul>

**Infringements of Ethical Code and Sanctions**

Checks

The Company's Ethical Code is one of the key elements of the monitoring system and an integral part of the Organization Model implemented by UniFor S.p.A. in accordance with the Italian Decree Law D. Lgs. 231/2001. The internal monitoring system shall be oriented to the adoption of tools and methodologies aimed at fighting against potential business risks, in order to establish a reasonable guarantee about the observance not only of laws, but also of internal provisions and procedures.

The management will constantly check for the conformity of behavior with the Company's Ethical Code and, if necessary, implement specific monitoring plans.

Observance of the Ethical Code, Reporting of Infringements to the Vigilance and Monitoring Body

The observance of the Ethical Code rules shall be considered as an essential part of contract obligations of employees in accordance with the art. 2104 of the Italian Civil Code. It shall also be considered as an essential part of contract obligations undertaken by coworkers who are not employees and/or individuals having business relations with UniFor S.p.A.

The Company's Managers are responsible for ensuring that the Company's expectations from its staff are understood and implemented by them. Therefore, the Company's Managers shall ensure that the commitments indicated in the Ethical Code are implemented.

For the purpose of ensuring the actual implementation of the Ethical Code, UniFor S.p.A. – ensuring the respect of privacy and individual rights – organizes information systems for all those who get to know any case of non-observance of the Ethical Code within the Company, so that they can freely and confidentially report to their Supervisors, and Supervisors shall inform the Vigilance Body. In case of emergency, reporting directly to the Vigilance Body is allowed either by signed letter in sealed envelope delivered to the Company's Vigilance Body, or through mail: [odv@unifor.it](mailto:odv@unifor.it).

With reference to any reported actual or attempted infringement of provisions contained in the Ethical Code, the Company shall ensure that no one is exposed to any reprisals, illicit conditioning, discomfort, or discrimination of any kind on the workplace, as a consequence of informing the Vigilance Body about the infringement of Ethical Code contents or internal procedures. Furthermore, as a result of any reports, the Company shall immediately order appropriate checks and, if necessary, appropriate sanctioning measures.

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**The Sanctioning System**

Any confirmed infringement, whenever identified, of the principles set forth in the Ethical code and the procedures established by internal protocols will affect the trust relationship between UniFor S.p.A. and its managers, employees in general, consultants, coworkers of any kind, customers, or suppliers.

Any infringements shall be incisively and immediately prosecuted, through the adoption – against anyone that has committed the infringements, whenever considered as necessary for the protection of business interests and compatibly with the provisions of current legislation – of appropriate and proportionate disciplinary and/or sanctioning measures, independently from any criminal implication, of such behavior, and the establishment of a criminal procedure in the case such behaviors are a crime.

Any confirmed infringements of the Ethical Code, based on the opinion of the Vigilance and Monitoring Body, shall lead to specific measures adopted by Human Resource Management. Consistently and in accordance with applicable legal and contract provisions, any confirmed infringements can also cause the dismissal of people that have committed infringements from UniFor S.p.A.

Any form of reprisal against anyone who has reported potential infringements of the Ethical Code, or requests for information about implementation modes, is also an infringement of the Ethical Code. The effects of infringements of the Ethical Code and internal protocols shall be kept in due consideration by all those who have any relationships with the Company. To this purpose, the Company shall disseminate the Ethical Code and protocols and/or internal procedures, and inform about any sanctions in the case of infringement and infliction modes and procedures.

To protect its image and resources, the Company shall not have any relationships with entities or individuals who do not intend to operate in rigorous compliance with applicable legislations, and/or refusing to behave according to the values and principles set forth by the Ethical code, and comply with the procedures and regulations provided for by annexed protocols.

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**Implementation  
of the Ethical Code**

This Ethical Code is disseminated through:

- The delivery to Trade Union Representatives and Workers' Representatives for Safety for due information and dissemination to all workers;
- Posting on the UniFor S.p.A. noticeboard;
- The delivery to all staff;
- The delivery to suppliers;

Any coworker getting to know non-public information shall be extremely careful in using such information and avoid its dissemination to non-authorized people, inside and outside the Company. This obligation shall remain applicable also after termination of employment relations for any reason whatsoever.