



Corporate Code of Ethics
27/10/2023

TEMPRALL SRL offers its current and potential customers the service of sorting and quality control on manufactured goods.

The activity of TEMPRALL SRL is made possible by the work of internal staff and external consultants, as well as the companies that provide goods and services to it. The awareness of these relationships and the resulting responsibilities, as well as the protection of customers, both public and private, and their needs, are part of the corporate culture of TEMPRALL SRL. In this ethical self-regulation code (the "Code"), TEMPRALL SRL aims to summarize the fundamental principles and rules of conduct that the administrators, executives, employees, and consultants, as well as suppliers of TEMPRALL SRL, are required to respect in conducting the business activities of the company and in performing their respective services, as well as in internal and external relationships.

II - Effectiveness of the Code

1-Compliance with the Code is an essential part of the contractual obligations of the employees, pursuant to and for the purposes of Article 2104 of the Civil Code. The principles and contents of the Code constitute an expression of the obligations of diligence, loyalty, and good faith in the performance of work that contribute to qualifying the proper fulfillment thereof. To this end, each employee signs a declaration acknowledging receipt of a copy of the Code and committing to comply with its provisions. A similar declaration is signed on each occasion of any modification to the Code.

2-Compliance with the Code is also required from continuous consultants and suppliers of machinery and services who, in any capacity, have access to the TEMPRALL SRL computer network. They confirm in writing the receipt of a copy of the Code and its subsequent modifications, committing to their observance.

3-The Code is made known to other suppliers, consultants, and third parties involved in the activities of TEMPRALL SRL, with an invitation to adhere to its principles and conduct criteria.

III - General principles

1. TEMPRALL SRL aims to conduct its activities according to the principles of sustainable development, satisfying the needs of the present generation without compromising the ability of future generations to meet their own needs. It particularly pursues economic efficiency without prejudicing social development and the environment.

2. TEMPRALL SRL promotes and defends the inviolable rights of humans, rejecting any discrimination based on gender, ethnicity, language, religious belief, political affiliation, sexuality, and other personal and social conditions in both external and internal relations.

3. TEMPRALL SRL operates in strict compliance with applicable national and international laws in Italy and in any other country where it operates. It is aware that the adoption and adherence to ethical principles are an essential element in preventing offenses in general and offenses covered by the responsibility of legal entities under Legislative Decree no. 231 of June 8, 2001. The behavioral rules outlined in the Code serve as the basic reference that recipients must adhere to in carrying out sensitive business activities under the aforementioned decree and in relationships with stakeholders, with particular attention to public administration and public officials and employees.

4. TEMPRALL SRL also observes the principles of integrity and transparency, conducting operations and transactions that are properly authorized, verifiable, consistent, and congruent. The company strongly rejects corruption as a means of conducting business, with no one able to promise or deliver money or other benefits

to obtain undue performances, and no one able to request or receive money or other benefits for performing undue actions.

5. As an entity operating on behalf of third parties, TEMPRALL SRL recognizes the importance of intellectual property and, therefore, respects and protects the content of various forms of intellectual property, including patents, trademarks, trade secrets, and know-how.

6. TEMPRALL SRL acknowledges that fair competition is fundamental for the development of business activities, and therefore, it refrains from engaging in any acts or behaviors contrary to free and fair competition.

7. The belief in acting for the benefit or in the interest of TEMPRALL SRL cannot in any way justify the adoption of behaviors contrary to the guiding principles of the Code..

IV - Relationships with customers

1. TEMPRALL SRL considers anyone utilizing the sorting and quality control services as its client.

2. TEMPRALL SRL does not discriminate among clients without objective reasons and bases its relationships with them on availability, professionalism, and honesty, as well as the general principles of this Code: human rights, financial integrity, protection of intellectual property, and fair competition.

3. Recognizing customer satisfaction as an essential element of the proper relationship, TEMPRALL SRL establishes procedures and tools to verify and assess the level of satisfaction. The company is prepared to take prompt and effective actions to recover and maintain this level. TEMPRALL SRL provides clear feedback to customer observations, requests, and complaints.

4. TEMPRALL SRL adopts necessary measures to ensure the conformity of customer data treatment with legal and regulatory provisions, and the confidentiality of such data according to specific customer instructions. The company uses acquired information only in direct connection and dependence on business relationships, excluding any insider trading behavior. Similarly, it ensures and maintains the confidentiality of any technical or commercial information learned during customer relationships.

5. TEMPRALL SRL pursues technological innovation in its business to anticipate market demands and meet customer needs. The company dedicates adequate resources to the study and development of new techniques and solutions. It also ensures the continuous training of its personnel to have a knowledgeable workforce capable of applying the most innovative solutions and operational techniques correctly.

6. TEMPRALL SRL guarantees the safety of the products it supplies to customers, ensuring strict compliance with all regulatory and technical standards and the implementation of adequate control procedures.

7. TEMPRALL SRL refrains from any deceptive, aggressive, or otherwise unfair practices in advertising and commercial communications with customers. These communications are characterized by clarity and completeness of information regarding the company's activities and services.

8. TEMPRALL SRL carefully evaluates the feasibility of services requested by customers, considering regulatory, technical, and economic conditions. Under no circumstances does it commit to contractual obligations that could lead to compromises in the quality of services or the safety of products. The primary

objective is to produce products characterized by parameters that ensure enduring levels of quality and safety.

V - Relations with suppliers

1. TEMPRALL SRL considers anyone who markets and/or manufactures and/or provides other services related to products and/or parts thereof, intended to be processed and/or incorporated into products manufactured by TEMPRALL SRL, as its supplier.
2. TEMPRALL SRL sources based on the quality of goods and services offered, their cost, the technical and economic reliability of the supplier, and punctuality in deliveries. The company recognizes conformity in the treatment of present and future suppliers on these bases. In particular, the selection of suppliers and the specific qualification process for those whose performances relate to the quality of the processing processes of products manufactured by TEMPRALL SRL,
3. TEMPRALL SRL is committed to preserving the health and safety of suppliers and their employees and collaborators who may occasionally operate in the TEMPRALL SRL facility according to current regulations. The company encourages suppliers to respect workers' rights and the protection of child labor in all circumstances.
4. TEMPRALL SRL adopts specific procedures for the transparent and impartial evaluation of the reliability and competence of each supplier, the suitability of their offer, and the guarantees of assistance and promptness in performance.
5. TEMPRALL SRL bases its relationships with suppliers on fairness and loyalty.

VI - Relations with employees

1. All those engaged in an employment relationship with TEMPRALL SRL for the pursuit of the corporate purpose are considered employees.
2. TEMPRALL SRL rejects discrimination among employees based on gender, ethnicity, religious belief, political affiliation, sexuality, and personal and social conditions. It particularly encourages and promotes equal opportunities between men and women. Personnel selection is carried out in accordance with the principle of non-discrimination, in line with actual and specific company needs and based on the professionalism requirements of the role.
3. TEMPRALL SRL fosters a work environment where the dignity of each individual is guaranteed, and relationships among people are based on respect, honesty, fairness, and collaboration. The company refrains from actions and behaviors not provided for in applicable collective and individual contracts, respecting the personal dignity of employees and collaborators, even in the exercise of authority and hierarchy, and avoiding any form of abuse.
4. TEMPRALL SRL values the skills, potential, and commitment of each individual, evaluating them uniformly for workforce organization purposes.
5. TEMPRALL SRL complies with all legal, regulatory, and technical standards applicable at any given time regarding the protection of the health and safety of workers. The company adopts appropriate control systems in implementation of general principles for eliminating risks, evaluating unavoidable risks, adopting source protection measures, choosing workplaces and equipment, planning prevention for the creation of a coherent complex that integrates technology, work organization, working conditions, social relations, and the influence of environmental factors. Priority is given to collective protection measures, and adequate instructions and information are provided to the staff.
6. In the processing of personal data of its employees, TEMPRALL SRL strictly adheres to legal provisions,

with any investigation into ideas, preferences, personal tastes, and private life of individuals expressly excluded.

7. Administrators and employees pursue the objectives and interests of TEMPRALL SRL in the performance of their respective activities. Therefore, they promptly and in writing inform their superiors or references of situations or activities in which they, their relatives up to the second degree, or de facto cohabitants may have interests in conflict with those of TEMPRALL SRL, or any other case where there are reasons of convenience. They commit to respecting decisions made by TEMPRALL SRL (e.g., activities in competition with TEMPRALL SRL, economic or familial relationships with suppliers, consultants, and/or clients, etc.). Adequate documentation of knowledge and authorization of conflicted interests operations is kept.

8. Gifts from clients and suppliers and their acceptance by administrators and employees of TEMPRALL SRL are permitted only when of a symbolic nature and therefore cannot abstractly justify preferential treatment. TEMPRALL SRL reserves the right to determine their destination or distribution methods among all staff.

9. Administrators and employees, as well as continuous consultants and suppliers of machinery and services who have access in any capacity to the TEMPRALL SRL computer network as per paragraph II.2., ensure and protect the utmost confidentiality of information constituting corporate assets or related to TEMPRALL SRL activities, in compliance with legal provisions, regulations, and internal procedures.

10. Administrators and employees perform their respective duties with diligence, efficiency, honesty, and correctness, utilizing their time and available tools to the best of their ability and assuming related responsibilities. In particular, they do not use information, assets, and equipment available to them for personal purposes in the performance of their function, role, or assignment.

VII - Relations with institutions and the community

1. TEMPRALL SRL maintains relationships with local, national, community, and international public institutions, as well as with public officials or individuals tasked with public service, in full compliance with current regulations and guided by loyalty, correctness, and transparency.

2. In the event that an administrator, employee, or collaborator receives explicit or implicit requests for benefits from a public official, they are obligated to immediately inform their hierarchical superior or the relevant authority to take appropriate action.

3. TEMPRALL SRL may respond to requests for contributions only from non-profit entities and associations with cultural, sports, or charitable purposes that involve a significant number of citizens. In selecting proposals, TEMPRALL SRL pays particular attention to situations of personal or corporate conflict of interest.

VIII - Relations with the environment

1. TEMPRALL SRL is guided, in its activities, by the protection and conservation of the environment, adhering to both European and national legislation concerning environmental protection. The company regularly assesses the impact of its activities on the environment to facilitate timely actions to remedy any adverse effects and correct operational deviations.

2. Specifically, TEMPRALL SRL aims to uphold the principles of implementing production processes with criteria aimed at preventing pollution and reducing environmental impact. The company is also committed to adopting the best practices for environmental and quality management.

IX - Employee reports (whistle-blowing)

- TEMPRALL SRL encourages employees and members of corporate bodies to report any suspicions

of fraud, unlawful or irregular conduct, and/or any serious danger or risk that may involve or harm employees, consultants, clients, suppliers, stakeholders, the public, or the company's reputation. Such information should be reported if it is discovered during work and management activities, following the definition of the whistleblowing activity outlined in the IATF 16949:2016 standard. Examples include, but are not limited to, dangers in the workplace, environmental damage, illicit financial operations, threats to health, and suspicions of corruption or extortion.

TEMPRALL SRL specifies that:

- - Every detailed report made within the company, as long as it is not anonymous, will be given due consideration, ensuring confidentiality regarding the identity of the reporter, subject to legal obligations regarding anonymity and confidentiality.
- - No negative effects related to the submission of a detailed and good-faith report will be incurred by the reporter.
- - The individual making a good-faith and detailed report will be protected from retaliation or other actions by individuals involved in the matters being reported.

X.- Implementation of the Code

1. The Code and any future modifications are adopted by TEMPRALL SRL through a resolution of the Board of Directors. The implementation of the Code and the responsibility for its updating are initially delegated to the said Board, which assumes the role of an Ethics Committee for this purpose. In case reports or other relevant facts involve one or more members of the Board, the exclusive investigation and final assessment will be entrusted to a third-party professional designated in advance by the Board of Directors. The professional must be immediately informed in writing of the report and other circumstances involving the position of the administrative body and/or individual directors.

2. TEMPRALL SRL takes appropriate initiatives to disseminate knowledge of the Code among all its administrators, managers, employees, consultants, suppliers, and stakeholders in general. Specifically, the Code is provided to employees, continuous consultants, and suppliers of machinery and services who have access to the TEMPRALL SRL computer network, in accordance with the procedures outlined in the preceding paragraphs II.1. and II.2. It is brought to the attention of other consultants and suppliers at the time of establishing contractual relationships with TEMPRALL SRL. The Code is available in electronic format on the TEMPRALL SRL website (at www.temprall.it).

3. TEMPRALL SRL ensures adequate communication channels to receive reports of any violations or observations regarding the application of the Code. In particular, these reports can be submitted:

- By inserting a written report in the designated location in the company's fixed workstation.
- Through a dedicated section on the website (<https://www.temprall.it/Whistle-Blowing/>)
- By regular mail to the address TEMPRALL SRL, via cav. Pierino Migliorati 28/B.

The identity of the whistleblower is kept confidential, as is the handling of the report, subject to legal obligations.

4. Following appropriate investigations, the Ethics Committee evaluates behaviors in confirmed violation of principles and rules incorporated in the Code that may warrant the application of disciplinary sanctions in internal relations or the application of contract resolution mechanisms in external relations. TEMPRALL SRL reserves the right to resort to legal actions and seek damages. Sanctions will also apply to reports that are clearly unfounded and instrumental.