



THE CODE OF ETHICS OF CECOMP S.p.A.

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CECOMP SpA has adopted this Code of Ethics as a corporate self-regulation tool to regulate the principles aimed at guiding the conduct that directors, managers, employees and collaborators, in any capacity, maintain according to honesty and integrity in conducting the Company's activities and in general in human relations inside and outside the corporate community.

The Code of Ethics describes the fundamental values which, according to ethical and social standards, inform and guide the decision-making process not only within CECOMP but also towards Customers, Suppliers and the Local Community that have a legitimate interest towards the same Company and whose contribution is essential for its success on the market.

It has also been prepared to enable CECOMP to exercise the due diligence necessary to promote in its business community a business culture that encourages ethical conduct and a commitment to comply with the law. Principles that are outlined as part of "Sustainable Success" understood as the "creation of long-term value for the benefit of shareholders taking into account the interests of other stakeholders relevant to the Company".

The CECOMP Code of Ethics is supported by procedures and protocols to strengthen the prescriptions of the same Code and communicate, both inside and outside the organisation, the will and methods of making the principles and values set out according to the described ethical-social responsibilities of all members of the corporate community.

The four pillars that support the Code of Ethics consist of the Codes of Conduct against corruption, against money laundering, for the respect of human rights and for the prevention of administrative liability of the Company.

This Code of Ethics therefore defines the fundamental principles that guide CECOMP in carrying out its daily activities. These principles concern human resources, the company and the market and for each area the specific topics are illustrated in which directors, managers, employees and collaborators carry out their daily activities with honesty and integrity for the continuous improvement of interpersonal relationships and social issues as well as for an improvement in entrepreneurial results in the context of "Corporate Sustainability".

"Corporate sustainability" is therefore obtained from the set of CECOMP policies aimed at pursuing entrepreneurial growth through the virtuous combination of the three dimensions (economic, social and environmental) of "SUSTAINABLE DEVELOPMENT".

Paolo FORNERIS

Chair of the Board of Directors

MISSION, VISION AND VALUES OF CECOMP S.p.A.

The **mission** of CECOMP SpA is summarised as follows:

“We build stylish models and produce in series complete new cars in low volumes. Partners of the world's leading OEMs, we produce show cars, hand-beaten and pre-series prototypes for R&D activities, manufacture prototype and production moulding equipment. We can manage turnkey projects from development to industrialisation and we experiment with new forms of sustainable mobility.”

The **vision** summarises in one sentence the growth path followed by the company from its foundation to today:

“From the history of a small Italian bodywork shop to the evolution into an industrial reality of international prestige, capable of supporting all phases of the product life cycle”.

The **values** that have animated CECOMP SpA since its foundation, which have been cultivated over the years under the banner of an essential ethical commitment and constantly consolidated by entrepreneurial activities, are represented by:

“Enterprise, Capacity for innovation, Flexibility, Global vision, Individual responsibility, Team spirit, Loyalty, Equity, Trust, Respect for customers' and suppliers' collaborators, Environmental protection”.

THE FUNDAMENTAL PRINCIPLES OF THE CECOMP SpA CODE OF ETHICS

1. HUMAN RESOURCES

1.1 RESPECT FOR PEOPLE

CECOMP develops the activities of its business processes with respect for the dignity of workers and their fundamental rights including the human rights of every single individual.

It recognises the centrality of human resources and promotes training so that satisfactory professional development and growth can be achieved, guaranteeing equal opportunities for all.

CECOMP is continuously committed to respecting human rights in line with the "Guiding Principles of the United Nations", with its adhesion to the "European Union Action Plan for Human Rights and Democracy" and applies the principles of the Plan of National Action (ITALY) on business and human rights (PAN/BHR 2021-2026).

It opposes any form of discrimination based on religion, nationality, gender, sexual orientation, political opinions or otherwise, while promoting gender equality and cultivating meritocracy.

1.2 FAIRNESS IN RELATIONS BETWEEN PEOPLE

CECOMP undertakes to ensure that relationships are established between people, both internally and externally, based on honest, sincere and correct attitudes.

Honesty, sincerity and correctness allow, in internal and external relationships, not to be recipients of partial truths, false statements, omissions or other forms of mystification of reality.

Directors, managers and workers as well as external collaborators carry out their professional services with diligence, accuracy and respect also in order to provide customers with products and services that meet the required quality requirements.

CECOMP develops its business processes in compliance with the law and opposes all forms of corruption both towards private parties and towards public subjects.

1.3 HEALTH AND SAFETY IN WORKPLACES

CECOMP is continuously committed to safeguarding the health and safety of workers in the workplace through scrupulous compliance with the laws and technical standards referred to, as well as through continuous information, education and training actions to increase the prevention of risks for health and safety of the corporate community also in relations with external parties.

Directors, managers and workers know and respect the rules of prevention and protection of their own health and safety as well as of all collaborators who could be influenced by the performance of their activities.

CECOMP undertakes to communicate any situation that may endanger the health and safety of people in the context of the business activity.

1.4 PERSONAL DATA PRIVACY

CECOMP collects and correctly processes the personal data of employees, collaborators, customers and other subjects, both natural and legal persons, of which it comes into possession.

It guarantees the confidentiality of the personal data subject of the processing carried out within it as well as the protection thereof with suitable measures, in compliance with the provisions of the Privacy Code. It also guarantees to any person the rights established by the laws in force.

CECOMP protects any non-public information relating to the Company, its collaborators or third parties who establish a relationship with the Company itself. For this reason, it safeguards the integrity of IT systems and adopts relevant policies so that personal data is adequately protected from unauthorised access or undue use.

2. COMPANY

2.1 LEGALITY

CECOMP considers the culture of legality (respect for the practice of laws) as a prerequisite for the growth and development of any organisation. For this reason, considering compliance with the rules a fundamental value for civil coexistence, it acts to affirm full compliance with the laws in force both at national and European level.

CECOMP supports the dissemination of legality among all recipients of this Code of Ethics and absolutely does not tolerate any action, even minimally, in contrast with the rules. In particular, the conduct of directors and managers is always based on respect for the law, also because they constitute reference models for all internal employees and external collaborators.

2.2 INTEGRITY

CECOMP considers the integrity of directors, managers and employees as an effective tool to reduce the probability that the risk of corruption occurs.

The management of this risk is strengthened by the commitment undertaken by CECOMP in respecting and enforcing national and international legal and technical standards relating to the fight against corruption. For this reason, all internal personnel and external collaborators exercise continuous and careful supervision with commercial, administrative and institutional intermediaries and operate with the utmost integrity so that commercial negotiations do not give rise to conduct or acts such as to lead to forms of active or passive corruption or to forms of complicity in the trafficking of illicit influences.

2.3 TRANSPARENCY AND TRACEABILITY OF ACTIVITIES

CECOMP guarantees the transparent conduct of directors, managers and internal employees who operate objectively, in compliance with the company's technical specifications and with the applicable technical and legal standards, and without any personal interest purpose.

With this commitment, each collaborator has the obligation to identify any risk of conflicts of interest and to operate in accordance with the interests of the Company.

CECOMP has clear and suitably documented procedures and instructions that identify roles and responsibilities as well as the methods for recording the activities, guaranteeing traceability and verifiability of the decision-making, authorisation and implementation processes.

2.4 CONFIDENTIALITY OF DATA AND INFORMATION

CECOMP guarantees the confidentiality and security of data and information generated internally during company processes and/or acquired from customers and/or suppliers for commercial needs.

It implements the protection of confidential know-how and confidential commercial information against illicit acquisition, use and disclosure by applying Directive (EU) 2016/943 transposed in Italy by Legislative Decree no. 63 of 2018.

CECOMP has developed, put into practice and keeps up to date a data and information protection plan to protect them both from external attacks from the network and from unlawful thefts.

Directors, managers and employees operate daily with conduct and technological measures to preserve the integrity of corporate data and information.

2.5 PROTECTION OF IMAGE AND REPUTATION

CECOMP protects its image and reputation (components of social and relational capital) that constitute a part of its assets of intangible resources. Protection is managed through the various company information and communication supports.

The quality of the institutional image and reputation of CECOMP are some of the characteristics without which the Company cannot guarantee lasting entrepreneurial success.

Directors, managers and employees operate daily, with their conduct and ethical behaviour, with the primary purpose of safeguarding this asset both in the workplace and outside of it, towards each person or institution.

2.6 PROTECTION OF INDUSTRIAL ASSETS

The systems, work tools, equipment both tangible and intangible, immovable or movable owned by CECOMP are used exclusively by employees authorised by the Company for the realisation of institutional purposes, within the limits of their duties and kept with the required diligence.

They are responsible for protecting the resources entrusted to them and ensuring their integrity and correct functioning in compliance with company procedures.

CECOMP uses the IT network resources correctly, in accordance with the provisions of internal procedures and in compliance with the security measures adopted.

The management and use of the industrial assets of the Company and/or third parties take place in compliance with the laws and regulations in force regarding copyright.

2.7 RESPECT FOR THE ENVIRONMENT

CECOMP has been implementing an environmental policy for years, which has led the Company to obtain environmental certification according to the ISO 14001 standard and consequently an improvement in stakeholder confidence in the ability of the Environmental Management System to protect and improve the environment.

Directors, managers and employees as well as external collaborators operate in compliance with the legislative provisions on environmental matters.

CECOMP carries out its operational processes in such a way as to guarantee respect and protection of the environment also through a reduction of the negative physical effects (emissions into the atmosphere, waste water, waste, etc.) and at the same time, a continuous stimulus to the growth of the sense of responsibility on the part of all employees and/or collaborators towards the environment.

2.8 INDUSTRIAL RESEARCH AND INNOVATION

CECOMP develops an industrial research and innovation activity as a fundamental driver for achieving its entrepreneurial success.

Directors, managers and employees as well as external collaborators operate in compliance with the legislative provisions on research & development as well as innovation. In particular, they refer to the "Frascati Manual" as regards research and development (*creative activities undertaken in a systematic way to increase the set of knowledge to be used in new applications*) and to the "Oslo Manual" as regards innovation [*implementation of a new or significantly improved product or process introduced on the market (product) or actually used in the company (process)*].

3. MARKET

3.1 QUALITY AND SAFETY OF PRODUCTS

CECOMP considers customer satisfaction as a factor of primary importance and therefore pays particular attention to understanding their needs and preparing the most responsive solutions to their needs.

CECOMP effectively applies the Quality Management System, in compliance with the IATF 16949 and ISO 9001 standards.

These Systems favour the improvement of production processes and the quality level of the products, including the general safety aspects thereof, also through the monitoring of the performance indicators of the processes necessary to guarantee the required level standard.

CECOMP ensures quality standards of the services/products offered in compliance with the technical specifications of the customers by continuously monitoring the quality perceived by them.

3.2 RESPECT FOR CUSTOMERS AND SUPPLIERS

CECOMP considers customer satisfaction to be the basis of its corporate values as well as fundamental for the continuity of the development of its business. For this reason, it promotes relations with customers based on honesty, transparency, integrity and therefore Directors, managers and employees of the Company respect the obligations and commitments undertaken towards them, provide accurate, complete and truthful information, and satisfy their reasonable expectations.

Directors, managers and employees of CECOMP, in conducting relations with the Suppliers of goods and services, comply with the principles of this Code of Ethics, as well as internal procedures.

The selection of Suppliers is carried out in compliance with the requirements of quality, price, convenience, capacity and efficiency and any type of commercial relationship is governed by a written contract. In supply relationships, CECOMP complies with the applicable legal provisions and the contractual conditions established in line with the strictest commercial practices.

3.3 FAIR COMPETITION

CECOMP considers free competition a primary asset to be protected and recognises that correct and fair competition affects its reputation; it also recognises that it is functional to the sustainable development of the company and the market in which it operates. CECOMP abstains from conduct aimed at favouring the conclusion of business to its own advantage in an unfair manner or in violation of the law, condemning any act carried out in violation of the regulations in force for its protection, even more through the use of threats and/or violence.

CECOMP refrains from making false statements, defaming and/or intentionally attacking the competition and avoids agreements, of any kind, with companies in the sector that could alter free competition, establishing sales prices or production volumes, agreeing sales areas or customers to serve.

3.4 CORPORATE SUSTAINABILITY

CECOMP has adopted Corporate Sustainability [the set of corporate policies that allow the Company to pursue a virtuous combination of the three dimensions (economic, social, environmental) of sustainable development] as a tool for integrating into the strategy, processes and products of the business, including environmental and social indicators.

CECOMP plans its activities by seeking a balance between economic initiatives and essential environmental and social needs, not only in compliance with current regulations, but also in consideration of the rights of future generations.

CECOMP publishes the voluntary non-financial statement (so-called NFS) compliant with Directive 2014/95/EU, transposed by Legislative Decree 254/2016.

CECOMP has drawn up specific procedures, as guidelines, to ensure the objective traceability of the activities, data and information that have contributed to composing the NFS.