

CODE OF ETHICS

PERONI POMPE S.P.A.

Approved by resolution of the Board of Directors on June 27th, 2025

GENERAL INDEX

Contents

Introduction	3
A. Basic principles.....	5
B. Relationships with Customers.....	5
C. Relationships with suppliers.....	6
D. Relationship with competitors	7
E. Relations with Public Authorities, Groups or Associations.....	8
F. Relations with shareholders.....	9
G. Relationship with the community and with civil society	10
H. Relations with and between employees	10
I. Confidentiality and Information Security.....	13
J. Transparent Accounting Information.....	14
K. Implementation and monitoring of the Code of Ethics	14

Introduction

Context

Peroni Pompe S.p.A. (hereinafter also "Peroni Pompe", "Peroni" or the "Company") is active, both in Italy and abroad, in the design and manufacture of reciprocating pumping systems for oil & gas and process applications.

Within the territories in which it operates, i.e. Milan and its surrounding areas, and South Pontino, Peroni is willing to act as a small engine for social, cultural and human development, through the respect and development of its employees, the enculturation of trust relationships with local suppliers, the support to sporting, artistic, and social activities, as well as the provision of a work environment that fosters family values.

Peroni, and all of its employees, believes that legal rules are not sufficient and do not represent the value that can define and distinguish the moral depth of a company if applied solely at an abstract level; therefore, it is necessary to combine and integrate the legal framework with a set of ethical principles aimed at encouraging appropriate behaviors and guide individual and collective choices within the Company itself.

Hence, Ethics are an outstanding tool to guide the behavior of Corporate Bodies, the Management, Directors, Employees, permanent External Contractors (hereinafter, the "Recipients") through and beyond the legislative Decree 231/2001 and the management system and rules adopted by the Company.

Purpose

This Code of Ethics (hereinafter, also "The Code") is a statement of the rights, duties and responsibilities that all Recipients shall necessarily observe.

As outlined in the introduction, mutual trust among employees is the basic principle of our Company; therefore, rules shall not be the main instrument on which the Company relies: all local laws and corporate regulations and procedures shall be respected, whereas individual behavior shall eventually be guided by personal conscience, as properly informed by this Code of Ethics.

It is essential that all be fully conscious of what are the values of Peroni, and what are the reasons why our customers purchase from us and not from our competitors; in any case, the image and credibility of the Company play a vital role in the success of the Company itself, as well as being a value for all employees and the community: any conducts prohibited by law, or in conflict with "common sense," or which are not in line with the DNA of The Company, should be avoided.

In the event that any uncertainties arise regarding compliance with prevailing legislation, the Recipients shall consult their direct manager or the Supervisory Body.

Functions

The Code of Ethics serves the following functions:

- *cognitive and preventive*: the codification of ethical principles of reference and some basic rules of behavior help adhere to the *modus operandi* of the Company.
- *legitimacy*: the Code illustrates the duties and responsibilities of Peroni towards third parties, so that the latter may find in it a recognition of their expectations;
- *incentive*: the Code, requiring compliance with the principles and rules set out therein, contributes to the development of an ethical conscience

The set of ethical principles and values set out in the Code of Ethics should guide the activities of those working for the Company, each within their area of responsibility.

The adoption of specific rules of conduct, to be observed in dealings with the Public Administration, with customers and with third parties in general, is also a concrete expression of The Company's commitment to effective compliance with the laws set forth in Legislative Decree no. 231/2001.

Scope and mandatory compliance with the Code of Ethics

The Code of Ethics applies to all Directors, Employees and Consultants of the Company which, for its part, undertakes to implement appropriate procedures, regulations or directives aimed at ensuring that the values set forth herein are reflected in individual behavior, while also taking all appropriate action in the event of any violations.

The employees and consultants of the Company are expected to adhere to the principles set forth in this Code of Ethics.

Any director, officer or employee who becomes aware of any violation of this Code of Ethics, also potential, is required to notify the direct manager, the senior management, or the Supervisory Body promptly.

It is the personal responsibility of each Company employee to observe, in addition to the laws and governmental rules applicable in Italy and in the foreign countries in which they operate, both the Code of Ethics and other internal Company policies and procedures, which they shall apply honestly and fairly.

Compliance with the provisions of the Code of Ethics is an essential part of the contractual obligations of The Company employees under and for the purposes of Articles 2104, 2105 and 2106 of the Italian Civil Code.

Any serious and persistent breach of the rules of the Code of Ethics which undermines the relationship of trust between the individual and The Company, will be subject to disciplinary action, without prejudice, for employees, to compliance with the procedures provided by art. 7 of Law 300/1970 (Workers' Statute,) collective labor agreements, and the disciplinary code adopted by the Company as regulated by item n. 7 "Disciplinary System" of Peroni Pompe S.p.A. Organizational Model.

Responsibility of all

Every person working in any capacity for The Company should feel responsible for contributing to a pleasant atmosphere in his or her office or department; this shall be based on mutual trust, support in times of trouble, both professionally and personally, on the thorough performance of the activities, and on the continuous improvement of performances.

Accurate work, commitment to completing tasks within the time agreed, and the pride for a job well done, are the cornerstones of corporate reputation.

The mere respect for laws, rules and any procedure is therefore necessary but not sufficient to guarantee the future of The Company and its employees.

Responsibility of those who coordinate and manage the activities of others

In addition to the obligations applicable to all employees referred to in the previous paragraph, those who have management roles and/or responsibilities towards the staff under their supervision and direction, must avoid any abuse of their position. More specifically, those who have management roles and / or responsibilities are required to:

- be impartial and avoid favoritism;
- make decisions with the utmost transparency and be able to justify the reasons;
- dismiss and/or avoid undue pressure with regard to anyone;
- avoid and discourage preferential treatment;
- not unduly use their own decision-making and management power in order to achieve benefits for themselves or others.

A. Basic principles

Art. 1

Behaviors respectful of laws, regulations, procedures and ethics

The operations of the Company are subject to the laws and regulations of each Country in which it operates.

Under no circumstances, may behaviors that violate the law or are contrary to the principles of ethics, be adopted.

Art. 2

Diversity

The Company is active worldwide, in socio-cultural contexts very distant from each other. It is necessary to recognize and accept the ethnic and cultural diversity, taking into careful consideration local peculiarities.

Peroni works considering the needs of the community in which it operates and wants to contribute to its economic, environmental, social, cultural, and civil development.

Art. 3

Respect for fundamental human rights

Peroni ensures that fundamental human rights and personal dignity of human beings are always guaranteed.

In no way shall the Company's activities result in discrimination or harassment in respect of third parties and it is the Company's task to prevent any violation of human rights.

Art. 4

Transparency

Peroni agrees to provide complete and transparent information as required by law and in compliance with what the Company deems appropriate to disclose in its own interest, of the employees, suppliers and customers.

Art. 5

Customer Care and Satisfaction

All activities and corporate behavior must be oriented to fulfilling the commitments of any nature undertaken toward customers.

The Company makes it a point of honor to timely deliver machines and documentation in accordance with agreed terms and to provide after-sale service in order to enable customers to go into full production.

B. Relationships with Customers

Art. 6

Safe and high-quality goods

The process of innovation – both the structured one and the one developed under contract – is aimed at offering useful solutions to Customers.

The Company strives to pursue excellence and meet the expectations of its Customers.

Peroni pays special attention to the design and construction details related to safety and easy operability of the machines.

Art. 7**Providing customers with essential information with the utmost care**

Peroni provides, with efficiency and courtesy, accurate and complete information to its customers about its products, i.e. Country of origin, manufacturing materials, specifications, performances, price and method of service delivery.

Explanations and direct assistance are always provided.

The inadequate indication of a precaution or notice regarding security are themselves to be understood as a product defect.

Art. 8**Handling of complaints**

It is Peroni Pompe's interest to respond promptly and in good faith to every inquiry, request or complaint by its customers.

In the event of accidents or other issues deriving from the products or services provided by the Company, the latter agrees to adopt immediately adequate procedures for investigating and handling any violations.

In case of accidents, the priority is to respond quickly to the customer by acting promptly to prevent recurrence of the incident by examining what happened, analyzing the causes, preparing internal and external reports and preventing any aggravation of the problem.

Art. 9**Exchanges of gifts with customers**

Peroni Pompe specifically prohibits any form of gifts that could be reasonably interpreted as exceeding normal business practices or courtesy, or aimed at obtaining favorable treatment in conducting any activity related to the Company.

This rule, which admits no exceptions, not even in countries where offering valuable gifts to commercial partners is customary, concerns both gifts promised or offered, and those received.

"Gift" means any type of benefit (cash, promise of jobs either by employment or consultancy, services, travel, etc.)

If a gift that exceeds these guidelines is offered to or received by anyone, the event shall be adequately documented and reported to the direct manager, who will dispose of it appropriately and inform, if necessary, the Supervisory Body.

C. Relationships with suppliers**Art. 10****Fairness and transparency in dealing with suppliers**

The Company recognizes the importance of its suppliers and is committed to building correct relationships, transparent and based on mutual trust avoiding any improper preferential treatment among them.

It is absolutely forbidden to discriminate unduly a supplier or rather use a dominant reference position to impose conditions resulting favorable only for the Company.

Processes for the selection, choice and approval of each purchase shall be easily reconstructed at any time.

When issuing an order, internal procedures shall be rigorously observed in order to ensure that no illegal practices occur (excessive price reductions, rejection of return of goods or services, request to redo the assignment, payment delays, reduction of the amounts due.)

The information and official documents related to the supplies must be conserved for the period established by applicable laws and referred to in the internal purchasing procedures.

Art. 11

Selection process of suppliers

As regards the selection criteria, the purchase process shall simultaneously pursue the maximum competitive advantage for Peroni Pompe, and grant equal opportunities, fairness and impartiality with each supplier.

Peroni Pompe must ensure the involvement of a sufficient number of suppliers in invitations to tender, as set forth in the relevant procedures.

Those who govern this process shall operate in a way that anyone in possession of the objective requirements set by the Company's regulations, may compete fairly in the supply of goods and services.

Peroni Pompe must operate in such a way as to pursue its corporate objectives accepting offers and quotations from different suppliers.

With regard to partnerships with universities, technical advisors or professionals, the selection criteria must be related to the quality and technical competence of the provider.

For particular types of goods / services, in addition to the normal qualifying criteria of the supplier, also the availability of resources shall be considered, including financial resources, as well as the ability to take action at the customer's location in the event of a fault.

Peroni agrees to avoid dealing mainly with single-client suppliers.

During the purchase process, priority will be given to suppliers who have contributed, throughout the entire tendering process, to the success of the Company's offer.

For certain categories of goods, framework agreements may be concluded in order to regulate purchases.

Art. 12

Exchanges of gifts with suppliers

Peroni Pompe is committed to decline any offer of gifts, in cash or in kind, from suppliers or subcontractors, except for those gifts that fall, according to common sense, in normal business practices and/or courtesy.

In particular, each member of the Purchasing Department shall maintain an ethically correct relationship and refrain from using his or her dominant position to obtain cash or other gifts from a supplier, or from pursuing any form of benefit also non-monetary.

Where a gift were delivered, however, the receiver has the responsibility to report immediately to his supervisor and inform the supplier that the gift cannot be accepted.

D. Relationship with competitors

Art. 13

Free and fair trade competition

Peroni strives to comply with the provisions relating to fair competition and fair trading laws and regulations in the various countries in which it operates and in no case takes action in derogation from those provisions.

Nevertheless, the Company endeavors by any other means to promote free and fair trade without adhering to cartels¹ or other unfair trade practices.

The Company agrees to participate fairly in tenders so that the winning bidder and the best prices may not be the result of predetermined agreements.

The Company does not sell, on a continuous basis, machines priced below their cost, not even to overcome competitors.

¹ "Cartel" shall be defined as the situation that occurs when interests, which normally should be in mutual competition, come together to determine price increases or the partitioning of the sale areas. It is commonly believed that even without a written agreement or contract, but with a simple verbal promise or a tacit agreement, there is an infringement of the law

Art. 14

False descriptions and comparative advertising

The description of a product or a service must be accurate and correct.

Peroni Pompe agrees not to provide, in relation to its products, false descriptions or information that could mislead customers.

Any forms of comparative advertising must comply with certain prerequisites in accordance with the laws in force, even though the prohibition on carrying out any communication campaign that uses misleading representations or false and defamatory comparisons of the products or services of a competing company remains in effect.

Art.15

Respect for intellectual property rights

Peroni recognizes full value to intellectual property (including patents, designs, trademarks, trade secrets and other properties, etc.) as this is acknowledged as an invaluable collective heritage, and works to protect it and to use it in an appropriate way.

The Company is committed to protecting its intellectual property from infringement as well as to respect the intellectual property of others, and to make sure not to violate it.

The intellectual property rights related to the Company activities belong exclusively to Peroni Pompe with the result that, whether an Employee or a collaborator has developed an invention or an idea as part of their work, he must immediately give notice to the Company.

In the development of a product, it is important to gain any useful information in advance to prevent that such activity can somehow affect the intellectual property rights of others.

E. Relations with Public Authorities, Institutions or Associations

Art. 16

Relations with Italian or foreign Public Authorities.

Peroni Pompe maintains an ongoing dialogue with national, local and international public institutions, and with regard to these relations, all employees must operate in compliance with the laws and ethics. In no way the conduct held against politicians and Public Officers must give rise to suspicions of corruption.

No employee or contractor, either directly or indirectly, or through a third party, should ever receive, offer or promise money, gifts or compensation in any form, or exert undue pressure, nor promise any object, service, or favor to directors, officers and employees of public authorities or entities of Public Service Employees or their close relatives or partners in order to induce them to perform an act conforming or contrary to official duties.

Providing money or gifts of any kind in exchange of a benefit constitutes corruption, even if it is a simple acceptance of a specific request. Any behavior that could be classified as corruption must be strictly avoided.

Recipients are required to rigorously abstain from showing false and / or altered documents to the Public Administration or detract and / or omit from showing, if due, documents, information or data of any kind, or behave in a way that tends to mislead the Public Administration.

The same care is necessary when dealing with Public Officials of foreign countries.

Art. 17

Exchange of gifts with public officials

Peroni Pompe does not offer gifts, entertainment or other forms of benefit to officers or employees of institutions or public companies both in Italy and abroad, except in the case of symbolic gifts.

This rule does not allow exceptions not even in countries where offering valuable gifts is customary and includes gifts both promised or offered and those received.

It is noted that "Gift" means any kind of benefit (promise of jobs either by employment or consultancy, services, travel, etc.)

Art. 18**Relationships with Regulatory Authorities and Judicial Authorities**

Peroni Pompe acts within the law and favors, within the limits of its powers, the proper administration of justice.

In carrying out its activities, it works together with representatives of the Judicial Authority, Police and any public official who has powers to inspect, providing all the information required by those authorities, in a complete, correct, timely and adequate manner.

Peroni Pompe requires Recipients to be fully available and collaborate with anyone who comes to inspect and control on behalf of the Supervisory Authorities.

In provision of a judicial proceeding, investigation or inspection by the Public Administration, it is forbidden to destroy or alter reports, records and any type of document.

Art. 19**Relationships with organizations and associations**

Peroni Pompe does not usually finance political parties, their representatives or candidates and refrains from any improper pressure (direct or indirect) against politicians. Whether Peroni Pompe considers appropriate to finance an election campaign or political representatives, it will do so in full compliance and within the limits of the existing legislation.

The Company may accept requests for contributions from organizations or associations no-profit and with regular statutes and constitutional documents that are of high cultural or beneficent value and involve a large number of citizens.

Any sponsorship activities must be devoted exclusively to events that offer quality assurance and that are properly documented from a fiscal and tax point of view.

In any case, in the selection of proposals to which to adhere, the Company pays particular attention to any possible conflict of interest, both at personal or corporate level.

F. Relations with shareholders**Art. 20****Relations with shareholders**

Peroni Pompe ensures its shareholders - current and future - transparency of action in the conduct of its activities. Peroni Pompe shall further recognize the shareholders' right to be informed on any circumstance deemed significant or of interest for the business administration, over and above the cases provided for by the applicable legislation. To that end, it shall establish suitable information flows – from subsidiaries and operational functions to the top management and from the latter to shareholders – in order to ensure that information is constantly updated and comprehensive.

Art. 21**Accurate accounting records and timely reporting**

The Company prepares transparent, reliable, and accurate reports, as prescribed by law, which faithfully reflect its financial situation and its operating results.

All transactions relating to business accounts must be accurately recorded and reported.

There shall be no inappropriate accounting management, nor are accounting frauds allowed.

Art. 22**Prohibition to grant incentives**

The Company does not grant incentives of any kind in relation to the exercise of the rights of shareholders. The law prohibits the Company or any subsidiary to request the help of shareholders or holders of ownership rights by offering pecuniary or other advantage in exchange of the Company's support at the General Meeting of Shareholders.

G. Relationship with the community and with civil society

Art. 23

Environmental protection

Peroni Pompe is committed to scrupulously observe the laws governing the environment and aims to a gradual reduction of the impact that its economic activities have on the environment and the ecosystem in general.

The Company has always promoted environmental protection in all its processes, from technical activities, to development and design, production, recovery and waste management.

The Company works to raise awareness of each employee about environmental issues, so that everyone can take steps in the direction of recycling, reducing consumption and respecting the environment in general.

Art. 24

Cooperation with local communities

Fully aware of its role in civil society, the Company strives to interact harmoniously with the various local communities and to serve to the best of its abilities the countries and individual areas in which it operates. Furthermore, the Company promotes and supports the participation of its employees in all initiatives aimed at social purposes.

Art. 25

Fighting anti-social forces

The Company is committed to fight in every way the anti-social forces which, in any capacity, undermine social order and collective security.

Whoever, working on behalf of the Company, is faced to deal with undue or illegal demands, should immediately consult his or her direct manager, or other competent body.

The Company, acting as a single entity, will handle these problems in collaboration with law enforcement bodies.

Art. 26

Fight against forced labor and child labor

In all the Countries where Peroni Pompe operates, any form of forced or child labor exploitation is prohibited.

Forced labor is prohibited in any way or in any form: no one can be forced to work against his or her will.

Peroni Pompe is not allowed to employ children younger than the minimum age specified by the legislation of each Country, neither directly nor through contractors and subcontractors.

It is necessary that the Company takes the utmost care in not giving support, even indirectly, to inhuman and degrading behavior.

H. Relations with and between employees

Art. 27

The value of human resources within the Company

Personnel constitute an indispensable element for the development and success of any company, and even within Peroni Pompe, the professionalism and commitment of employees represent essential and decisive values for achieving the company's objectives and goals. For these reasons, the company is constantly committed to developing the skills and potential of each employee in carrying out their duties, so that the abilities and aspirations of individuals can be fully realized in achieving corporate objectives. To this end, the operations of Peroni Pompe, and in particular the function responsible for personnel management, must be guided. The company is committed to offering equal employment opportunities to all employees based on professional qualifications and performance abilities, without any discrimination.

Beyond the standards and principles established by the applicable legislation on labor law, Peroni is committed:

- respect, even during the selection process, for the personality and dignity of each individual, avoiding situations in which people may feel uncomfortable;
- prevention of abuse and behavior with discriminatory content based on political and trade union opinions, religion, race, nationality, age, sex, sexual orientation, health status, or generally any intimate characteristic of the human person;
- appropriate training for each individual's position;
- definition of roles, responsibilities, delegations, and availability of information that allow each person to make decisions that are within their competence and in the interest of the Company;
- prudent, balanced, and objective exercise by those responsible for specific activities or organizational units of the powers connected to the delegated authority;
- clear, precise, and truthful internal communication regarding the Company's policies and strategies; Peroni fosters a non competitive but cooperative work environment among colleagues;
- a proper and confidential use of personal data;
- workplaces adequate for the safety and health of those who use them.

The main value to be shared is trust.

The recruitment of staff occurs with regular employment contract in full respect of the law and any national labor contract applied, encouraging the inclusion of the worker in the workplace.

Art. 28

Discrimination and harassment

Peroni Pompe firmly prohibits any form of harassment - psychological, physical, and sexual - against employees and partners, and between them.

Harassment is any form of intimidation, threat or unwanted behavior that is an obstacle to the peaceful conduct of duties or roles, or the abuse by the direct superior of his or her position of authority.

Sexual harassment refers to the abuse of his or her hierarchical position to ask for sexual favors in exchange of something or the use of a language that contains explicit sexual references, or again a conduct liable to deteriorate the work environment to the point of not being ignorable by the victim any longer.

Stalking means imposing persistent and repeated attentions on others against their will, according to one's affective or hostile instincts.

Mobbing means using authority in a professional context to harm the dignity of another person. A superior should never exceed the reprimands to his or her coworkers, nor should he or she indulge in behaviors that indicate contempt for them, for example by refusing to assign work tasks, ignoring them or jeering them.

Art. 29

Staff duties

The staff is committed to fulfill its obligations under this Code of Ethics and to comply, in carrying out its duties, with the law and the Company's internal procedures, and act in accordance with the principles of integrity, honesty and loyalty.

Each Recipient must act fairly and in good faith, respecting the obligations undertaken in the contract of employment and ensuring the required performance.

He or she must also know and observe the rules of ethics contained in this Code and focus his or her conduct towards mutual respect and cooperation.

Peroni Pompe's staff, regardless of the duty performed and / or the level of responsibility, must know and implement the provisions on the protection of the environment, safety and work hygiene and privacy protection.

Art. 30

Respect for the Company assets

The staff is required to work with diligence and respect for the protection of Company assets, using with care and responsibility the resources entrusted to the same, avoiding any improper use that could cause damage or reduce efficiency, or otherwise contrary to the interests of the Company.

Executives and Employees of Peroni Pompe are personally responsible for the protection of corporate resources entrusted to them and must promptly inform their direct managers of events that are potentially harmful to the Company.

Art. 31

Conflict of interest

In the conduction of business activities, situations where the parties involved are, or may be, in conflict of interest must always be avoided. This means that each Recipient must ensure that every decision made in his or her range of activity is taken in the interests of the Company and complies with the plans and strategies of corporate bodies.

Therefore, any kind of conflict of interest between economic activities, personal or of the family, and business duties covered, should be avoided.

For example, the following situations can lead to conflicts of interest:

- the existence - overt or covert - of economic and financial interests of the staff and / or their families in the activities of suppliers;
- the use of information acquired in the performance of work activities for one's own benefit or of third parties in conflict with the interests of the Company;
- the performance of work activities of any kind (work and intellectual), among customers, suppliers, third parties in conflict with the interests of the Company;
- the abuse of one's position for the realization of interests that conflict with those of the Company;
- the conclusion, completion or the start of negotiations and / or contracts in the name and / or on behalf of the Company, which have as their counterpart family members.

Before accepting a consulting, management, administration position or any other assignment in favor of a person other than the Company, which may be in potential conflict with the interests of the same, each manager and employee is required to notify his or her supervisor or the Supervisory Board.

Art. 32

Use of IT systems

Each employee is responsible for the security of information systems used and is subject to applicable regulations and conditions of license agreements.

Except as required by civil and criminal laws, the improper use of assets and enterprise resources includes the usage of the Company net for purposes that are not related to employment or to send offensive messages or that may damage the image of the Company.

Each employee is also required to provide the necessary commitment to prevent, to the extent possible, the commission of crimes through the use of IT tools.

In particular, each Manager and Employee of the Company must, for example, adopt the following behaviors:

- use the data information processed by the Company's IT system, including electronic mail, in the manner and within the limits set by the Company;
- use data and computer information systems correctly, avoiding uses aiming at the collection, storage and dissemination of data and information for purposes other than the Company's activities;
- use IT information without altering the hardware and software configurations provided by Peroni Pompe;
- do not send offensive and / or minatory emails, nor use foul and obscene language, or expressing comments that could offend the person and / or damage the corporate image;
- avoid sending commercial and advertising communications, using the Company computer network improperly;
- do not visit Internet sites with unseemly, offensive content, contrary to law or good customs, or that is not strictly work-related;
- do not use Peroni Pompe's mobile phones and land lines outside of the Company policies defined;

- do not make unauthorized copies of licensed programs, for Company use or for third parties.

The use of these inadvertent assets for any purpose not permitted can cause serious damage to Peroni Pompe, with the aggravating circumstance of potential penalties and the initiation of disciplinary proceedings against the managers or employees responsible.

Art. 33

Relationships with the Mass Media

All contacts with the news media must be handled by the relevant persons in charge.

The information provided to the mass media must be accurate, coordinated and consistent with the Company's principles and policies; it must respect the laws, rules and practices of personal conduct; and must be furnished in a clear and transparent manner. The dissemination of false information is strictly forbidden.

Art. 34

Safety and Healthcare at the workplace

Peroni Pompe strives to comply with all applicable occupational safety and health laws making every effort to improve both health and safety of workers.

Safety protection laws shall be strictly observed by the Company but also each employee must behave respectfully towards security policies as required by the laws and regulations regarding this issue.

Peroni Pompe is committed to consistently implement procedures for the prevention of accidents and occupational diseases and to develop the most accurate and comprehensive training on healthcare and safety.

I. Confidentiality and Information Security

Art. 35

Confidentiality

Peroni Pompe ensures the confidentiality of information and personal data processed conforming to the requirements of confidentiality of personal data pursuant to the Legislative Decree n. 196/2003 ("Data Protection Law" and subsequent modifications, additions and implementing regulations.)

Particular attention is paid to the processing of personal data of workers, a field in which Peroni Pompe enacts specific precautions to inform each Manager, Employee or external Collaborator on the nature of the personal data processed by the Company, on the processing, on the areas of communication and, in general, on all data related to the person.

Confidential information² obtained in the course of professional activities shall not be divulged in any way and cannot be used for the Company's own interests or in ways that are contrary to the law or that harm the objectives of the Company.

This confidentiality obligation remains even after the Manager, the Employee or the Collaborator has terminated the employment relationship or collaboration (for retirement, voluntary resignation, dismissal, etc.)

Sensitive data must be handled with discretion, respecting the privacy and the laws and regulations of each Country where the Company operates.

Employees, when using IT tools or a computer system, must strictly observe the safety rules and must refrain from improperly disseminating confidential information.

² "Confidential Information" refers to any information on internal management, customers, technological or financial issues, specific transactions, as well as data on personnel or private information about individual employees

J. Transparent Accounting Information

Art. 36

Transparency and completeness of accounting operations

Peroni Pompe shall provide training to the Recipients so that the truthfulness, relevance, completeness and correctness of the information concerning its operations and its financial position and performance be guaranteed both within and outside the Company. To that end, any transaction shall correctly and promptly be traced and recorded in the corporate accounting system in accordance with the methods provided for by the law and the applicable accounting principles.

Each transaction shall be authorized, verifiable, legitimate, consistent and appropriate.

For the accounting system to comply with the requirements of truthfulness, completeness and transparency, full documental evidence substantiating any performed activity shall be kept by the Company so as to enable:

- the tracking and recording of each transaction;
- the immediate determination of the characteristics and information underlying such transaction; an easy formal and chronological reconstruction of each transaction;
- easy formal and chronologic log of the operations;
- the review of the decision-making, authorization and implementation process, as well as the identification of different levels of responsibility and control.

Each accounting record shall exactly reflect the contents of substantiating documentation. As a result, the Code Recipients shall be responsible for the documentation to be easily retrievable and sorted in accordance with logical criteria and in compliance with corporate procedures and instructions.

No payment in the interest and on behalf of Peroni Pompe can be made without suitable documental evidence and a formal authorization. Managers, employees and external contractors who discover omissions, counterfeits or negligence in accounting records or in supporting documentation are required to promptly report such nonconformities to their immediate superior or the Supervisory Board. External advisors shall report directly to the Supervisory Board limited to the activity performed on behalf of Peroni Pompe.

K. Implementation and monitoring of the Code of Ethics

Art. 37

Supervisory Board

The Supervisory Board is an organ of the Company with the characteristic of independence, autonomy of action and control, whose activity is characterized by professionalism and impartiality.

It is placed in a top management level within the Company hierarchy, and in direct relationship with the Board of Directors to which it reports any violations of this Code of Ethics and operates in continuous action. The Supervisory Board is ensured adequate financial autonomy through the allocation of resources by the Company and is not assigned to operational roles so as to ensure the greatest possible objectivity of action.

Art. 38

Dissemination and communication of the Code of Ethics

The Company undertakes to disseminate this Code of Ethics by using all means of communication and opportunities available (information meetings and business training, web portals, hard copies, etc.) A copy of the Code of Ethics shall be made available and / or posted in a place accessible to all employees.

Everyone, and in particular the Management, shall include the contents of the Code of Ethics in training programs and make reference to it in all procedures, policies and corporate guidelines.

Peroni Pompe ensures the dissemination of the Code of Ethics also among its suppliers and business partners sensitizing them to respect its principles and not to engage in any behavior that could lead the Recipients themselves to the violation thereof.

Art. 39

Updating the Code of Ethics

The text of the Code of Ethics is periodically reviewed by the Supervisory Board.

Any revision and / or material change shall be communicated to all stakeholders in accordance with the procedures referred to in the preceding point.

Art. 40

Control of the Code of Ethics

The Supervisory Board also has the task of ensuring, through audits or other means deemed appropriate, compliance with this Code of Ethics.

Art. 41

Reporting violations of the Code of Ethics

All those involved, be they employees or collaborators of the Company, are required to report any violation of this Code of Ethics to his or her supervisor or to senior management and in any case to the Supervisory Board as specified in paragraph 5 of the Organizational Model.

Any reports must be submitted in a detailed and specific manner.

Reports cannot give rise to any form of retaliation against anyone who collaborated in a disclosure process.

Anonymity is guaranteed to the persons making the reports, provided they communicate the violation using the procedure showed in <https://peronipompe.segnalachi.it/>.

Art. 42

Penalties for violations

The Company may adopt, in respect of an Employee who behaves in an inconsistent manner to the Code of Ethics and to the Model of Organization, Management and Control, disciplinary measures, appropriate and commensurate with the seriousness of the violation.

Any violations of the principles of this Code of Ethics by other stakeholders shall be charged against the subjects involved and will allow the Company to exercise the right to declare, if necessary, termination of the contract.

Such termination clause must be inserted in all contracts with key suppliers and subcontractors of the Company.