

Code of Ethics

1. Introduction and Letter from the Management

Since it was founded more than forty years ago, Wirutex Srl has built a reputation for its technological innovation, the qualitative excellence of its tools, and the remarkable depth of expertise of its people. Our growth is founded upon the trust that our partners, customers and suppliers place in us, as well as on a deep sense of responsibility towards the community and the environment in which we operate.

This Code of Ethics (hereinafter referred to as the "Code") is not simply a formal document - rather, it represents the formalisation of the principles of integrity, fairness and transparency that guide our daily actions. In an increasingly complex and demanding global market, our reputation is measured not only by the quality of our patents and products, but also by the integrity that we demonstrate through our processes and our people. We do not tolerate any form of illegal, corrupt or unethical behaviour, in any form or at any level.

We ask every employee, collaborator, director and partner not only to read, but also to understand, adopt and actively promote the principles contained herein. We are each guardians of Wirutex's reputation, and we have a personal responsibility to act in an appropriate and correct manner - even and especially when no one is looking. These principles are the foundation of our sustainable success and serve to guarantee our reputation in the long term.

The Wirutex Srl Management Team

2. Scope of Application and Recipients

The principles and provisions of this Code apply both in Italy and abroad to the following:

- **Corporate Bodies (AMM):** The Directors (AMM), the Auditors and the members of the Control Bodies (such as the Supervisory Body, if appointed).
- **Management and Employees:** All staff, starting from the **General and Plant Management Team (DG)**. The Code applies in a binding manner to all functions and at all levels, specifically including the following (as per the company's organisational chart):
 - **Staff and Management Support Functions :** Internal Quality Manager (RIQ), Safety (H&S), Head of Environmental Management (RGA), Data Centre (CED), Maintenance (MAN) and Switchboard (CENT).
 - The **Operational and Central Functions:** Administration (RAMM), Purchasing (RACQ), Logistics (RLOG).
 - The **Technical Area (RTEC):** Including CAD Design, Bills of Materials and Cycles (DB), CAM Programming, Times & Methods (TM), Programming (PPROD) and Testing (RTEST).

- The **Production Area (RPROD)**: Including all managers and operators of the various departments (Turning, Milling, Cutting, Welding, Sandblasting, Surface Treatments, Diamond Cutting, Assembly, Balancing, Sharpening, Deburring and Control).
 - The **Operational Logistics Areas**: Warehouse MP (MAGMP), Acceptance (ACC) and Warehouse for Dispatch (MAGPP).
 - The **Commercial & Sales Area (RCOM)**: Including Area Managers (Italy/Abroad), Agents, Order Management & After-Sales (AVEN), Marketing & Communications (MRTG) and Service (SERV).
 - Any and all other blue-collar, white-collar and managerial staff, with any type of contract (permanent, fixed-term, apprenticeship).
- **External Collaborators**: Consultants, agents (who are not employees), business brokers, temporary workers, interns and anyone acting in the name of, on behalf of or in the interests of Wirutex, even where only temporarily. We expect these parties to formally adhere to this Code, which will become an integral part of their contracts.
 - **Transparency**: Our communications (both internal and external), our transactions and our accounting are truthful, complete, accurate and traceable. All financial flows and performance data must be recorded correctly, without ambiguity.
 - **Fairness and Fair Competition**: We behave in a fair, loyal manner in our relationships with colleagues, customers, suppliers and institutions. We reject any form of deceptive commercial practices, false advertising, and any other act designed to denigrate the competition or manipulate the market.
 - **Rejection of Corruption**: We condemn and actively fight all forms of corruption, both public and private, and both active (giving) and passive (receiving), and we operate a zero tolerance approach in this regard.
 - **Respect for People**: We value our human capital. We ensure that our working environments are safe (both physically and psychologically) inclusive and respectful of the dignity of each individual, as well as being free from any discrimination (based on gender, age, ethnicity, religion, sexual orientation, political opinion) and any form of harassment.
 - **Quality and Innovation**: We pursue excellence and technological innovation (a key element of our ISO 9001 certification). We protect our intellectual property (patents, know-how) and respect that of others, including that of our customers and partners.
 - **Sustainability**: We manage our operations in an environmentally and socially responsible manner, in line with our ISO 14001 certification and our sustainability policy. We are committed to optimising resources, reducing waste and promoting responsibility throughout our supply chain.

3. Rules of Conduct: Prevention of Illegal Activities

Wirutex adopts a zero-tolerance policy towards any form of illegal behaviour.

3.1. Fight against Corruption (Public and Private)

Wirutex expressly prohibits any behaviour that could constitute a corruption offense. It is prohibited to offer, promise, give, solicit or accept, either directly or indirectly (for example through family members, friends or third-party companies), payments, gifts, financial benefits or other undue advantages:

1. To Italian or foreign **public officials** or public service representatives, in order to influence a duty of their office, obtain preferential treatment, expedite a procedure or secure an undue advantage (e.g. a contract, a license). So-called "facilitation payments" are also prohibited.
2. To **private individuals** (e.g., employees, directors or collaborators of other companies) to induce them to perform or omit acts, in violation of their official duties (e.g., revealing confidential information about a tender, favouring Wirutex in supply contracts), in order to obtain a commercial advantage for Wirutex.

These prohibitions apply even if such behaviour is carried out through intermediaries, consultants or agents. Wirutex prohibits the use of consultancy or agency contracts to disguise corrupt payments.

3.2. Gifts, Presents and Benefits

Acts of commercial courtesy, such as gifts or any form of hospitality (lunches, invitations to events), are permitted only if:

- They are of symbolic or modest value.
- They comply with the law, with normal commercial practices and cannot be interpreted as being intended to obtain undue advantages, to influence the recipient's independent judgment or to create a sense of obligation.
- They are transparent, authorised in advance by the relevant manager (if they exceed a minimum threshold), and adequately documented and recorded in the company accounts.
- They are not offered or received during critical negotiation phases (e.g. tenders).

Accepting or offering gifts of money or cash equivalents (e.g., generic gift certificates) is prohibited. Any gift received that exceeds a modest value must be reported to the relevant manager or to the Supervisory Body, who will arrange for this to be dealt with appropriately (e.g., by returning it, sharing with the team).

3.3. Prevention of Fraud, Extortion and Embezzlement

Wirutex strongly condemns any act of fraud, extortion or embezzlement.

- **Fraud:** Any form of artifice or deception (e.g., falsification of documents, alteration of data) designed to damage third parties or the company itself in order to obtain unfair benefit is prohibited. Examples include:
 - Falsifying expenses or travel-related costs.
 - Altering quality control data (ISO 9001) or R&D test results.
 - Providing false information to public bodies in order to obtain funding or grants.
- **Embezzlement:** It is absolutely forbidden to appropriate, divert, or use for personal purposes any funds, assets (tangible or intangible) or other benefits made available to oneself for official reasons. This includes:
 - Money, product samples, tools, equipment.
 - Intellectual property such as patents, technical drawings, design data, source code, customer databases.
- **Extortion:** The use of violence, threats or undue pressure (including psychological) to force others (colleagues, suppliers, customers) to perform acts that generate unfair profit or benefit for Wirutex or its representatives, or that harm third parties, is prohibited.

3.4. Anti-Money Laundering and Flow Traceability

Wirutex is committed to preventing the use of its economic activities for the purposes of money laundering or self-laundering of funds derived from illicit activities. We carefully check the reliability and legitimacy of our business partners and suppliers. All financial transactions must be legal, traceable, documented and handled exclusively through official banking channels.

4. Further Rules of Conduct

4.1. Relationships with Customers and Partners (Fairness)

We build relationships with our customers and partners (including suppliers) based on the utmost fairness, transparency and collaboration.

- **Supplier Selection:** Suppliers and partners are selected exclusively on the basis of objective, documented, and traceable criteria, such as: product/service quality (in line with our ISO 9001 standards), cost, reliability, technical capacity and ethical-legal alignment (including respect for human and labour rights).
- **Transparency:** We provide customers with accurate information about our products and services, without making misleading promises.

4.2. Conflicts of Interest

Recipients must avoid any situation that could create a conflict - even where this is only potential - between their personal interests (or those of their family members/acquaintances) and the interests of Wirutex. Examples of conflict of interest include:

- Having direct or indirect economic interests in a supplier, customer or competitor.
- Carrying out working activities (including consultancy) for a competitor.
- Using one's position to promote the hiring or progression of a family member.

Any potential conflict must be immediately reported **in writing** to one's manager and the Supervisory Body, and the subject in question must refrain from participating in any related decision until otherwise indicated.

4.3. Protection of Company Assets and Intellectual Property

Each recipient of this Code is responsible for the protection and preservation of the company assets, both tangible and intangible (know-how, patents, technical data, CAD/CAM drawings), as entrusted to him/her.

- **Physical Assets:** The use of company property (PCs, telephones, tools) for personal purposes is prohibited, unless otherwise provided for.
- **Data and IT Security:** It is mandatory to scrupulously adhere to all company IT security policies, protect your login credentials (which are strictly personal), refrain from installing unauthorised software, and from transferring company data to personal media or unsecured channels.

4.4. Sustainability, Health and Safety

- **Health and Safety:** Wirutex is committed to respecting and promoting health and safety at work. It is the duty of every employee to comply with safety regulations, use Personal Protective Equipment (PPE) correctly, and immediately report any dangerous situations or near-injuries. Working under the influence of alcohol or drugs is strictly prohibited.
- **Environmental Sustainability:** In line with ISO 14001, we promote energy efficiency, waste reduction, proper waste management, and the use of low-impact materials where technically possible.

5. Whistleblowing System

Wirutex encourages the reporting of any violation, or suspected violation, of this Code, internal procedures, or other applicable regulations. The company has established dedicated reporting channels, in line with Legislative Decree 24/2023, which guarantee:

- The identity of the whistleblower and the content of the report are kept strictly confidential.
- The report can be submitted anonymously (where permitted by law).

- The report will be impartially managed by a designated committee or by the Supervisory Body, which will analyse the facts and take the necessary measures.
- Any form of retaliation or discrimination, direct or indirect, against those who report in good faith, is strictly prohibited.

6. Sanction System

Violation of the principles and rules contained in this Code of Ethics constitutes a breach of contractual obligations (for employees) and contractual obligations (for external collaborators) and damages the relationship of trust with the company.

Such violations will be pursued promptly and impartially. Sanctions will be applied in line with the principle of proportionality (commensurate with the seriousness of the facts) and in accordance with the law and applicable National Collective Labour Agreements.

For employees, sanctions may include a verbal warning, a written warning, a fine, suspension from service, and, in the most serious cases, dismissal for just cause. For other recipients, violations may result in termination of contractual relationships and possible claims for damages.

7. Approval and Dissemination

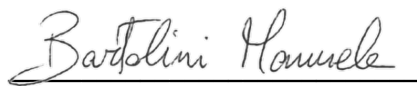
This Code of Ethics is approved by the Board of Directors of Wirutex Srl. The company undertakes to:

- Ensure maximum internal and external dissemination of the Code.
- Provide periodic and mandatory training to all employees to ensure full understanding.
- Ensure that the Code is updated periodically (at least annually, or as regulations change) to ensure it remains aligned with corporate and legislative developments.

Date:

29/10/2025

The Management



Bartolini Emanuele