

OVERVIEW:

This Code of Ethics and Corporate Social Responsibility outlines the rules of behaviours aimed at supporting sustainable growth and protecting the reputation of the company, in compliance with shared principles and values.

The principles contained in this Code complement the behaviours that each recipient is required to observe.

This Code does not list with every single ethical principle to which behaviours must be in line with and is not intended to replace - but may be integrated by - any other legislative, regulatory, or organisational provision provided by applicable laws and existing policies, procedures and/or organisational regulations.

This Code must be read and interpreted in conjunction with other codes of conduct, policies, procedures, guidelines and/or organisational provisions currently existing or that may be released in the future.

The sense of responsibility, based on the fairness of actions, transparency, and continuity of relationships with everyone, such as clients, suppliers, employees, and the entire community, guaranteed through the necessary attention to the rules and proper operation as well as dialogue and clearness, are the foundation of lasting relationships and good reputation of Sinergy Solution.

Scope of application

This Code applies to all directors, employees and Third Parties who carry out activities with and on behalf of Sinergy Solution, whether directly employed by the Company or not, and in all countries in which it operates.

Sinergy Solution expects the behaviour of all its stakeholders to be in line with what is stated in this Code.

The Code can be consulted by all involved Third Parties and freely downloaded from the Group's website.

Principles and values

Sinergy Solution, when dealing with personal details in full of its business partners, avoids any discrimination based on age, gender, health status, nationality, political orientation, and religious beliefs.

In carrying out their professional activities each Recipient is required to adopt behaviours in line with the principles of fairness, honesty, and transparency.

The same principles must be an inspiration for the relations among Recipients at all levels.

As for its business affairs, Sinergy Solution is oriented towards the following principles:

- innovation, defined as the competitive ability to adapt its products and services to the ever-changing needs of the market, including the opportunities offered by the technological development for the purpose of cost efficiency and improvement of production process quality
- maximization of profitability and achievement of excellence as for the services offered to customers in order to maintain and increase corporate value
- the implementation of strategies in terms of efficiency and openness to the market, within the framework of fair competition with other operators and firm rejection of any collusive and/or abusive behaviour to the detriment of clients and consumers in general
- bond with the territory

The principles on which Sinergy Solution founds its activities are based and developed taking into consideration guiding values that underlie working activities and the achievement of long-lasting success:

- fighting child labour
- ensuring wages and benefits
- respect for working hours
- fighting any form of slavery
- guaranteeing free association and collective bargaining
- fighting any form of mistreatment and discrimination
- fighting all forms of corruption, extortion, and bribery
- guarantee the protection of information
- fair competition and anti-trust
- eliminate conflicts of interest
- ensure and protect intellectual property

Reporting

Sinergy Solution has provided for the creation of communication channels through which involved parties may report issues on the Code of Ethics or its possible violations. To report an issue, write directly to privacy@sinergysolution.com.

INTERNAL RELATIONS

Employees

Working conditions

Sinergy Solution recognizes that its People are its most important asset and is committed to maintaining a high level of employee retention also through the following principles:

- it does not employ child labour
- provides fair compensation and benefits in accordance with applicable law
- does not use forced labour
- recognizes and respects the right to work and freedom of association,
- does not tolerate any form of discrimination
- ensures a healthy and safe working environment for all employees
- complies with regulations on working hours
- takes local communities into consideration
- does not tolerate any form of corruption
- runs its business in an environmentally friendly and responsible manner

Sinergy Solution deeply believes that all people should have equal access to jobs, facilities, services, and programs, regardless of personal characteristics and conditions that are not related to performance, skills, knowledge, or titles.

We recognize and promote the positive value of diversity and do not tolerate any type of discrimination and harassment based on gender, race, religion, creed, age, ethnic origin, nationality, marital status, maternity or paternity, pregnancy, disability, sexual orientation, or any other personal characteristic and/or condition.

Health and Safety

Respect for individual and collective health is one of the core principles underlying all activities and, therefore, cannot be violated in any company decision or by any employee.

Sinergy Solution pursues this goal through a timely risk assessment and definition of mitigation actions, guaranteeing the use of suitable working methods, equipment and working environments to ensure the health and safety of all workers and through specific training and communication activities aimed at raising the awareness of all employees and collaborators.

Environment

Sinergy Solution actively fosters sustainable and responsible development.

This commitment goes beyond compliance with the law, promoting the integration of environmental best practices into all business decisions.

All service management stages take into account the reduction of environmental impact: particular attention is paid to the implementation and constant development of technologies that enable energy saving, emission reduction, and the adoption of waste recycling strategies.

Corporate information and asset protection

All corporate information shall only be accessible to employees or other specifically authorised individuals, in accordance with the applicable corporate rules and procedures/policies.

Every employee and collaborator are required to actively contribute, within the scope of their functions and responsibilities, to the safeguarding and management of intellectual property in order to enable its development, protection, and enhancement.

Sinergy Solution guarantees the protection of information and personal data concerning its Employees and Third Parties or those of any Stakeholder and prevents their misuse, limiting data access to those employees who need such information/data for organisational and business purposes, in compliance with applicable laws and the requirements of best practices for the protection of privacy.

Each employee and collaborator are directly and personally responsible for the protection and care of assigned company assets. These assets must be used in a careful and responsible manner, avoiding uses other than those permitted by the Company and that could damage their efficiency or result in non-compliance.

Business computers and email accounts, as well as the information contained therein, are owned by Sinergy Solution and are to be used for business tasks and purposes, and for limited personal use that is compatible with the pertaining and specific procedures.

Contents of corporate computers and email accounts may be inspected and controlled, in accordance with local laws, for example to verify possible criminal behaviour or to protect rights and property.

EXTERNAL RELATIONS

Local Community and Public Administration

Sinergy Solution considers the population and the local communities of the territory in which it operates among its main Stakeholders and is committed to promoting relations with them in the forms provided for by the laws applicable in the different legal systems.

Sinergy Solution is committed to implementing all prevention and control measures deemed appropriate in order to ensure, within the scope of its operations, full compliance with applicable

laws and regulations, supervisory and safety regulations, industry self-regulatory standards, internal rules, and regulations, in any geographical context and at all decision-making and executive levels. The Recipients, in compliance with the law and the provisions and regulations in force, are required to align their actions and conduct with the principles, objectives and commitments set out in this Code.

It is forbidden to make any kind of payment, offer or receive any benefit of value in the context of relations with the Public Administration in order to obtain or maintain an assignment or any other commercial advantage.

Suppliers

The relation with all suppliers is based on and inspired by the principles of efficiency, loyalty, fairness and impartiality and we expect and request them to comply with the same principle.

Clients

With the aim of offering the highest level of satisfaction to its clients, Sinergy Solution devotes its efforts to manufacture and market products that meet customer requirements in terms of safety, environment, and reliability. Such relations must be based on the principles of mutual transparency, respect for market and antitrust rules, through reliable and fair behaviour and guaranteeing complete and accurate information on the products it offers.

Cogent national and international requirements

Sinergy Solution fully implements the regulations in all its prescriptions through continuous and constant updating of national and international regulations with the support of external competent companies that help the company maintain control and suitability of its working methods as for the final product.

Fair competition and anti-trust compliance

Fair competition is a fundamental prerequisite in creating business success through positive performance.

Sinergy Solution unconditionally recognises the principles of market economy and fair competition, also known as antitrust laws, and acts in accordance with competition, antitrust and trade regulations.

Agreements that are in violation of fair competition are strictly prohibited, as are business practices that may be in violation of anti-trust laws.

Fair business management

Sinergy Solution accurately manages and communicates corporate financial data in compliance with the rules and according to prevailing industry practice and implements everything in its power to minimise the risk of counterfeit materials and products being introduced to the market and to implement procedures for compliance with the laws and restrictions for goods export and import.

Grezzago, September 01, 2023

Legal Representative

Caterina Morri