MABER HOIST S.r.l.

Code of Ethics

Approved by the Board of Directors on 28 July 2025

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Introduction

This document identifies the shared values, principles and duties that all collaborators of MABER Hoist S.r.l. (hereinafter also referred to as "Maber" or "Company"), both those who work within it and third parties who relate to Maber, must abide by.

This Code is an integral part of the Organisation, Management and Control Model adopted by the Company pursuant to Legislative Decree 231/2001. The principles and values expressed herein integrate the scope of application of the Model and define the conduct that must be adopted by all Recipients for the purpose of preventing unlawful conduct, including those that are not precisely regulated by the Model itself.

1. The Recipients

Directors, Statutory Auditors, Employees and Managers, Suppliers, Consultants, Collaborators and, in general, all those who work on behalf of or in favour of the Company (hereinafter the "Recipients"), or who in any case contribute to the achievement of the company's objectives, each within the scope of their role and responsibilities, are required to observe and ensure compliance with the aforementioned principles in the performance of their professional activities and to act with rules and methods inspired by the same values.

To third parties (collaborators, suppliers, consultants, etc.) Maber requires compliance with the ethical principles on which this Code is based, also by virtue of specific contractual clauses.

Compliance with the provisions of the Code of Ethics is an integral part of the contractual obligations of the Employees, while their violation by the Recipients constitutes, as the case may be, a disciplinary offence (punishable in compliance with applicable legislation) and/or a breach of contract and may result in compensation for any damages resulting from such violation against the Company.

All Collaborators undertake to:

- respect the principles and apply the rules of conduct of the Code of Ethics;
- support the functions in charge in order to ensure effective implementation of the Code of Ethics;
- promptly report any violations of the Code of Ethics of which they become aware.

2. The fundamental principles

2.1 Compliance with the law

The Company undertakes to ensure that EU, national and regional laws, current regulations, as well as commonly accepted ethical principles in the conduct of business are respected internally and externally.

The Recipients are required to observe and comply with the rules of the legal system in which they operate and must refrain from committing violations.

2.2 Dignity, equality and integrity

The Recipients of this Code must recognize and respect the personal dignity, privacy and personality rights of any individual.

In carrying out their duties, the Recipients shall conduct themselves in a manner inspired by transparency and moral integrity, taking into account the social, economic, political and cultural contexts in which they operate and, in particular, the values of honesty, fairness and good faith.

Recipients work with colleagues of any gender, nationality, culture, religion, race and social class. The Company guarantees and promotes respect for gender equality and discrimination of any kind is not tolerated.

2.3 Professional diligence

The loyalty, ability, professionalism, seriousness, preparation and dedication of the staff are decisive values and conditions for achieving the Company's objectives.

Each Recipient carries out his or her activity with the professionalism required by the nature of the tasks and functions exercised, employing the utmost commitment and diligently carrying out the necessary in-depth and updating activities.

Conduct in contrast with the aforementioned precepts is not tolerated, nor can the lack of knowledge of the same be justified in any way.

2.4 The fight against corruption

MABER does not tolerate any form of corruption, whether active or passive, direct or indirect, by its employees and all Third Parties operating in the interest of the Company.

All management is committed to promoting a culture of legality in which corruption is never accepted; any conduct in violation of the principles of this Code will be investigated and, if the responsibility of the person who committed it is ascertained, the disciplinary sanctions provided for by the applicable legislation will be applied.

No employee may be sanctioned, retaliated or discriminated against for refusing to engage in corrupt acts or for denouncing actual or attempted acts of corruption, even if such refusal may have had negative effects on the Company's business.

2.5 The fight against organized crime and money laundering

MABER undertakes to activate relationships of any kind exclusively with adequately accredited and verified counterparties, in full compliance with the anti-money laundering legislation in force and the provisions issued by the competent Authorities.

Each Recipient shall refrain from having relationships of any kind, even if indirect or through an intermediary, with subjects (natural or legal persons) who are known to be or have reason to be suspected of being part of or carrying out support activities in any form in favour of criminal organisations of any kind, including those of a mafia nature, those dedicated to human trafficking or the exploitation of child labour, as well as individuals or groups operating for terrorist purposes.

If there is evidence of any transactions deriving from illicit relationships or activities that could constitute the commission of a crime, except for the need to make the appropriate reports to the competent authorities, the Recipients undertake not to use, replace, transfer in economic, financial, entrepreneurial or speculative activities, the money, goods and other benefits deriving from the commission of such crimes.

2.6 Conflicts of interest

The Recipients, in the performance of their functions, must avoid situations that may generate conflicts of interest, even if only potential, or constitute an interference with the ability to make impartial decisions in the interest of the Company.

The following situations are to be considered in conflict, among others:

- participation in any form in the activities of competitors;
- instrumentalization of one's corporate position for the pursuit of interests in contrast with those of the Company or for the pursuit of interests of a personal nature;

- use of information acquired in the performance of work for one's own benefit or for the benefit of third parties and in any case contrary to the interests of the Company;
- assumption of corporate offices or performance of work activities of any kind at suppliers, competitors and third parties in general in contrast with the interests of the Company.

Any situation potentially likely to generate a conflict of interest or in any case to jeopardise the Recipient's ability to take decisions in the best interest of the Company must be immediately communicated to the Management Body and also determines, for the Recipient, the obligation to refrain from carrying out acts connected with or relating to such situation

2.7 The competition

MABER complies with and applies the laws and rules of competition in force in the European Union and in the countries in which it operates and ensures compliance with the principles of competition and full transparency of its actions.

All agreements restricting competition, or any other form of conscious coordination aimed at preventing, restricting or distorting competition, as well as the adoption of commercial strategies that lead to an abuse of its position, as an economic condition that allows the Company to operate an effective hegemony on the market and hinder free competition, are prohibited.

The Recipients must behave correctly in the context of their activities and refrain from defaming or denigrating their competitors. They are also invited to pay close attention to compliance with these rules and to the application of the principles in the performance of their duties.

2.8 Personnel management

Personnel management is based on the principle of fairness and equal opportunities; The recognition of the results achieved, the skills and professional competences expressed by people are the essential criteria for career and salary advancement, in continuous and systematic comparison with the market, ensuring transparency on the method of evaluation and communication.

The selection of personnel is conducted in compliance with the principles set out in this Code of Ethics, equal opportunities and without any discrimination.

All staff are hired with a regular employment contract and the relationship is carried out in full compliance with the collective bargaining regulations of the sector to which they belong, tax, social security and insurance regulations, as well as the provisions on immigration.

No form of irregular labour is tolerated and respect for human rights is ensured, in particular through the absolute prohibition of child labour and the employment of illegally resident third-country nationals.

2.9 Harassment in the workplace

MABER does not tolerate any form of isolation, exploitation or harassment for the purpose of discrimination, for personal or work reasons, by any employee or collaborator towards another employee or collaborator.

This includes, but is not limited to:

- Creation of an intimidating, hostile or otherwise discriminatory work environment against colleagues;
- Hinderance to the individual job prospects of others for mere reasons of personal competitiveness or that of other employees;
- making decisions of relevance to the recipient's working life conditional on the acceptance of sexual favours or personal and cultural differences;
- inducing collaborators to sexual favours through the influence of their role;
- alluding to physical or mental disabilities and impairments or to forms of cultural, religious or sexual orientation diversity.

2.10 Alcohol, drugs and smoking

The use of drugs and any substance capable of altering the psycho-physical balance of those who use them is prohibited.

Smoking is also prohibited in the workplace, with the exception of areas specifically assigned to be used for this, and anyone who is forced to suffer passive smoking is required to inform the competent subjects.

2.11 The protection of personal data

MABER guarantees the processing of data and information in its possession in full compliance with the confidentiality of the interested parties and the current legislation on the protection of personal data and undertakes to adopt suitable security measures to protect the systems in which personal or sensitive data are collected and stored, in order to avoid the risk of destruction and loss, unauthorized access, or unauthorized processing of such data.
The data and information acquired are stored for a period of time not exceeding that necessary for the purposes of collection and cannot be used for purposes unrelated to the company's activity.
The Recipients must ensure the utmost confidentiality of the information acquired or processed in order to carry out their functions.
It is absolutely forbidden to use confidential data and information for purposes other than those for which they were communicated, except in the case of express authorization and, in any case, always in strict compliance with the legislation in force on the subject.
The data acquired or processed by the Recipients during their work belong to the Company and may not be used, communicated or disclosed without specific authorization.

2.12 The protection of company assets

The company's goods and equipment are used for service reasons, in accordance with current regulations.

It is forbidden to use company assets and IT resources for purposes contrary to the law, public order or morality, as well as to commit or induce the commission of crimes. It is also forbidden to engage in conduct that may damage, alter, destroy or deteriorate computer systems, programs and data of the Company or of third parties.

Use for personal purposes is permitted, provided that it is done within reasonable terms and is not to the detriment of any professional activity. Each employee is responsible for the IT tools made available to him.

You may not install software, or any other modification, on company assets; It is also forbidden to use company resources for consultation, storage, dissemination and, in general, any activity that includes materials with child pornography content or for which you do not have the rights to use.

3. External relations

3.1 The Public Administration and Supervisory Authorities

Relations with the Public Administration are inspired by the principles of correctness, truthfulness, transparency and collaboration and are held in compliance with the regulations in force, the principles of this Code and company procedures.

In all relations with Public Administration and Supervisory Authorities, the Recipients must operate in compliance with the laws and regulations in force and professional correctness.

In the context of relations with the Judicial Authorities, the Supervisory Authorities and the Institutions with inspection and control powers, maximum availability, collaboration, transparency and fairness must be ensured even during inspections as well as timely, complete and clear information.

In general, it is forbidden to:

- promise, offer or in any way pay or provide sums, goods in kind or other benefits, including as a result of unlawful pressure, in a personal capacity to public officials or private interlocutors, with the aim of promoting or favouring the interests of Edenred;
- provide or promise to provide, solicit or obtain information and/or documents that are confidential or in any way likely to compromise the integrity or reputation of one or both parties;
- behave in any way intended to improperly influence the decisions of officials who process or make decisions on behalf of the Public Administration;
- favour, in the purchasing processes, suppliers and sub-suppliers as indicated by the representatives of the Public Administration themselves as a condition for the subsequent performance of the activities (e.g. awarding of the order, granting of subsidised financing, granting of the licence);
- coerce the will of the Recipients to respond to the Judicial Authority or induce them to make use of the right not to respond.

Such actions and conduct are prohibited if they are carried out either directly by the Company through its employees or through non-employees acting in the name, on behalf of and/or in the interest of the same.

3.2 Customers

The Recipients are required to comply with the procedures and internal operating rules adopted by the Company for the management of customer relations, in order to meet their expectations and interests.

In initiating commercial relationships with new customers and in the management of existing ones, the Recipients must avoid having relations with subjects involved in illegal activities or, in any case, lacking the necessary requirements of ethics and commercial reliability, as well as maintaining financial and commercial relationships with subjects who, even indirectly, hinder human development and contribute to violating the fundamental rights of the person.

3.3 Suppliers

The selection of suppliers and the purchase of goods and services of any kind are carried out on the basis of objective and documentable criteria, based on the search for the best balance between economic advantage and quality of service. In its relations with suppliers, MABER is inspired by the principles of transparency, loyalty and free competition.

The Company contractually commits its suppliers to comply with the law, as well as to become aware of and adhere to the principles set out in this Code of Ethics, reserving the right to adopt any appropriate measure in the event of violation by the supplier of the rules established by the Law and the Code. No forms of collaboration are initiated with parties who do not intend to operate in strict compliance with current legislation or who refuse to comply with the values and principles that inspired this Code and the Organization, Management and Control Model.

3.4 Gifts, donations and other contributions

The Recipients may not offer, provide, promise or grant to third parties, directly or indirectly, even on the occasion of holidays, gifts, benefits or other benefits, including in the form of sums of money, goods or services for the purpose of obtaining undue advantages.

Gifts or forms of hospitality are allowed in the context of normal courtesy relationships as long as they are of modest value and in any case such as not to influence the recipient's autonomy of judgment and not to give the impression that they are aimed at acquiring or granting undue advantages.

In the case of gifts granted to persons belonging to Public Administration, it must be verified in advance that these fall within the limits allowed by the Codes of Conduct, rules and regulations in force for Public Employees.

In any case, these types of expenses must always be incurred in full compliance with the company procedures in force.

4. Health, safety and environment

4.1 Occupational health and safety

MABER promotes the participation of employees in the process of risk prevention and protection of health and safety for themselves, colleagues and third parties and is committed to ensuring a working environment that complies with the regulations in force on health and safety, through the monitoring, management and prevention of risks related to the performance of professional activities.

All Recipients are required to:

- comply with health and safety rules and procedures;
- use machines, devices and equipment correctly;
- use personal protective equipment correctly;
- report any work situation involving a serious and immediate danger, as well as any defect in the protection systems;
- participate in training sessions;

- participate in the fulfilment of health protection requirements to enable the employer to ensure that the working environment and conditions are safe and risk-free;
- contribute, together with the Employer, Managers and Supervisors, to the fulfilment of the obligations envisaged to protect health and safety in the workplace.

4.2 Environmental protection

MABER undertakes to manage its activities in full respect of the environment, through the timely monitoring of all applicable legal requirements in the environmental field, striving for timely compliance with them also through the involvement and awareness of the personnel directly involved in the activities, as well as of the subjects who, although not part of the corporate structure, are linked to the Company by contractual relationships for the management of activities with an environmental impact.

The Recipients, each by virtue of their role and responsibility, must ensure and promote the protection of the environment, as a fundamental asset for the community, through punctual compliance with the regulations in force at the time, continuous improvement and the constant search for eco-sustainable operating methods.

5. Budget and taxation

5.1 Accounting and financial statements

MABER ensures that its administrative-accounting system correctly represents the operating facts and provides the tools to identify, prevent and manage financial and operational risks and fraud that may be to the detriment of the Company.

The accounting is based on generally accepted accounting principles and systematically records the events deriving from management. All accounting records that form the basis for the preparation of financial statements must be drawn up in a clear, truthful and correct manner and carefully maintained by the company structures responsible for preparing them.

Adequate documentation must be retained in support of each operation, which allows easy accounting recording, reconstruction of the operation and identification of any liability.

The Recipients are required to collaborate in the correct and timely recording of each management activity in the accounts and to ensure that all business transactions are represented correctly and promptly.

5.2 Tax management

MABER does not tolerate any form of tax evasion or avoidance and promotes and implements tax management aimed at minimizing the risk of operating in violation of tax rules or in contrast with the principles and/or purposes of the tax system, also in order to prevent tax disputes, maintaining an attitude of transparency and dialogue towards the Tax Authorities.

All Recipients undertake:

- to comply with all applicable tax laws and regulations;

- to work to ensure that tax returns offer the most complete and truthful representation possible;
- to promote a culture of tax compliance, providing continuous training on tax laws and encouraging ethical behavior in all business activities;
- to provide accurate and complete tax information to the competent authorities, avoiding any form of falsification or manipulation of tax information.

6. Rules for the implementation of the Code of Ethics

6.1 Adoption and dissemination

This Code of Ethics and any future updates thereto are defined and approved by the Company's Board of Directors.
The Code is disseminated, including via electronic format, to all resources through a specific communication from the Governing Body. A copy of the Code is posted on the bulletin board on the Company's premises.
Any amendments to the Code are published and made available in the same manner as described above.

New hires are given this Code together with the Organisational Model adopted pursuant to Legislative Decree 231/01, in order to ensure that they have the knowledge considered of primary importance.
This Code shall enter into force on the date of its approval by the Board of Directors.

6.2 Disciplinary system

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations envisaged for the Company's employees, pursuant to current legislation, as well as for Consultants, Collaborators, Suppliers and for those who become Recipients of this Code, with reference to the existing contractual relationship.

Any act contrary to the provisions of this Code by an employee will result in the imposition of sanctions proportionate to the respective violations and in accordance with the provisions in force on the regulation of employment relationships.

Infringements committed by Recipients who are not employees are sanctioned by the competent bodies in accordance with the express provisions of the relevant contractual clauses.

For anything not provided for in this paragraph, reference is made, to all intents and purposes, to the provisions on the sanctioning system in the General Part of the Model referred to in Legislative Decree no. 231/2001.

6.3 Reports

In order to ensure the effective implementation of this Code and to allow the reporting of any violations of which Recipients have become aware in the context of their work and/or professional activities, the Company has implemented specific reporting channels managed in the manner governed by the "Whistleblowing Policy".

Reports can be made by registered mail to the address:

Organismo di Vigilanza di Maber Hoist S.r.l.
Viale dell'Industria e dell'Artigianato 16
Carmignano Di Brenta (PD), 35010

The Company guarantees the protection of the whistleblower from any form of retaliation and/or discrimination and the protection against acts of retaliation is extended to all subjects connected in a broad sense to the organization and/or person of the whistleblower as defined by art. 3 of Legislative Decree 24/2023.

With respect to reports made by persons who have declared their personal details and whose reports are madein bad faith and/or prove to have slanderous or defamatory content, the measures provided for in Par. 6 "The disciplinary system" of the Organization, Management and Control Model adopted by the Company will be activated, and appropriate legal protection action will also be considered. Except in cases of liability for slander or defamation, the submission of a report under the "Whistleblowing Policy" does not constitute a breach of the obligations arising from the employment relationship.