Code of Ethics

adopted from MAEG COSTRUZIONI SPA

Sited in Vazzola (TV), via Toniolo 40, 31028,

with resolution of the Board of Directors of 10 June 2025

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Index

- Premise
- Purpose of the Code of Ethics
- Approval of the Code of Ethics and related amendments
- Dissemination of the Code of Ethics

Art. 1 - Recipients

Art. 2 – Object

Art. 3 - Company conduct

3.1 Principles of conduct in relations with the Company's interlocutors
3.1.1 Authorities and Public Administration
3.1.2 Clients
3.1.3 Suppliers and subcontractors
3.1.4 Political, trade union and mass media organizations

3.2. Principles of conduct in internal relations
3.2.1 Employees and collaborators
3.2.2 Updating and training of human resources

Art. 4 - Forms of protection

4.1 Protection of competition
4.2 Environmental protection
4.3 Protection of the privacy of employees and suppliers
4.4 Health and safety protection in the workplace
4.5 Protection of human resources

Art. 5 - Basic principles in the behavior of the Recipients

5.1 Responsibility
5.1.1 Use of IT systems
5.2 Legality and Fairness
5.2.1 Conflict of interest
5.3. Confidentiality
5.4 Loyalty and collaboration

Art. 6 Sanctioning system

Premise

Maeg Costruzioni SpA (hereinafter also "Company") is an Italian company founded in the 1989, specialized in the design, supply and installation, in Italy and abroad, of steel structures such as bridges, viaducts, civil and industrial buildings, stadiums and sports complexes, roofs, container unloading cranes and other special structures, products in the establishments of Vazzola (TV), Cimavilla (TV), Codognè (TV), Maron (PN) and Budoia (PN).

Purpose of the Code Ethical

Maeg Costruzioni SpA believes in the value of the work and considers legality, correctness and transparency of actions as essential prerequisites for the achievement of the own economic, productive, social objectives.

Through this Code of Ethics, the Company has defined the set of ethical and moral principles that have always been the basis of its activity and, more specifically:

- the fundamental lines of conduct adopted by the Company, both within its own organization, in relations with and between employees, and externally, in relations with institutions, suppliers, customers, commercial partners, political and trade union organizations, and information bodies;

- - the rules of organization and management of the Company, aimed at creating an efficient and effective system of planning, execution and control of activities, in order to ensure constant compliance with the rules of conduct and to prevent their violation by any person operating for the Company.

Through this Code of Ethics the Company has also provided the Recipients (as defined in the following art. 1) with fundamental guidelines so that they have the essential value references to guide their own behavior, prohibiting the performance of actions that could damage the Company as well as those behaviors that conflict not only with the provided regulations of time in time applicable, but also with the values promoted from the Society.
The individual and collective behavior of employees, collaborators and commercial partners of *Maeg Costruzioni SpA* must, therefore, be in harmony with company policies and must translate concretely into collaboration, social responsibility and respect from the regulations in force, following the standards of conduct identified by this Code of Ethics.
The Organism of Surveillance, established to the senses of the Legislative Decree n. 231/2001, also verifies compliance with this Code of Ethics by the Recipients, as well as the actions developed by the Administrative Body of the Company and its managers and appointees for the dissemination, application and control of the Code itself.

Approval of the Code Ethics and related changes

This Code of Ethics was approved by resolution of the Board of Directors on 10 June 2025.
With a subsequent further resolution of the Board of Directors, the Code may be modified and/or integrated, also on the basis of suggestions and indications coming from the Supervisory Body.

Diffusion of the Code of Ethics

Maeg Costruzioni SpA undertakes to give the widest possible dissemination to the provisions of this Code of Ethics, both inside and outside the Company, so that all the Recipients, identified in the following art. 1,

are aware of the conduct recommended, prescribed and prohibited.
To this end, the Code of Ethics will be displayed in paper format, by posting in a place accessible to all employees and collaborators, as well as published in electronic format on the Company's website (www.maegspa.com).
The Company undertakes to adopt any further initiative, so that they are promptly disclosed and applied the principles and the prescriptions of the Code of Ethics, too by means of the organization of special information and training meetings with the Recipients.
This Code of Ethics is published in Italian and in its English and French translation.
In case of conflict, between the different versions and the related interpretations, prevails the Italian version.

Art. 1 Subjects recipients

This Code of Ethics is addressed to all those who have working, collaboration, consultancy, supply, subcontracting, performance of works or services, or commissioning relationships with *Maeg Costruzioni SpA* and, in particular:

- Employees;
- Coordinated and continuous or occasional collaborators;
- Consultants and professionals linked to the Company by professional mandates;
- Suppliers of goods and services, continuous or occasional;
- Anyone who, for any reason, activity or contractual relationship, operates in the interest or in the name and on behalf of the Company,

hereinafter jointly referred to as “Recipients”.

This Code of Ethics is valid in Italy and abroad, finding reasonable application in relation to the different cultural, political, social realities, religious, economic and commercial of the various countries in which the Company operates.

Art. 2 Object

This Code of Ethics is to be considered binding for the Company and for the Recipients, who, through a specific contractual clause, undertake and are obliged to respect it.
Maeg Costruzioni Spa will not start or continue any relationship with anyone who does not intend to respect such bond.

Art. 3 Behavior from the Society

3. 1 Principles of behavior in the relationship with the Company's interlocutors

3.1.1
Authority and Public Administration

For the purposes of applying this Code of Ethics, Public Administration means any public body, public company, independent agency or authority, natural or legal person, acting as a public official or in charge of a public service.
Relations with the Authorities and the Public Administration must be based on maximum clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards.
To this purpose, it is forbidden to:

- - Grant or promise compensation in any form, directly or through others, to induce, facilitate or illegitimately remunerate the performance of an official act or an act contrary to official duties by the Public Administration;
- - Implement the same conduct aimed at promoting, damaging or exerting illicit pressure on a party in a civil, criminal or administrative proceeding;
- - Accept any provision of value, object or service in order to obtain preferential treatment in relation to any relationship with the Public Administration;
- - Submit false declarations to national or community public bodies, in order to obtain public grants, contributions or subsidized financing; - Allocate sums received from national or community public bodies as subsidies, contributions or financing for purposes other than those for which they were intended.

If anyone acting on behalf of the Company receives explicit or implicit requests of benefits of whatever nature from part of a public official or a person in charge of a public service, must inform without delay his/her hierarchical superior or the Administrative Body of *Maeg Costruzioni SpA,* which will evaluate whether to immediately suspend all relationships and, in any case, case, no will give communication to the Organism of Supervision.

3.1.2
Clients

Maeg Costruzioni SpA maintains relationships with its Clients based on correctness, professionalism, efficiency, seriousness and reliability, maintaining high levels of quality, performance and reliability.

The Company expressly prohibits the encouragement, execution and tolerance of corrupt practices, illegitimate favors, collusive behavior, direct or indirect, as they are aimed at formalizing a contractual relationship with a current or potential Customer.

In managing relationships with Customers, the Company's employees are required to scrupulously observe all internal procedures, as well as to provide accurate, truthful and exhaustive information on the products and services offered, so that the Customer can make informed decisions.

In relationships with its representatives, the Company ensures correctness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as the faithful and diligent fulfillment of the same.

3.1.3
Suppliers And subcontractors

Maeg Costruzioni SpA sets its own conduct in the reports with suppliers of goods and services and subcontractors to the principles of transparency, equality, loyalty and competition.

The selection of suppliers and subcontractors and the determination of purchasing conditions are based on an objective assessment of the quality and price of the goods or services, as well as the guarantees of assistance and of timeliness.

AND precluded the choice of suppliers and subcontractors on an exclusively subjective and personal basis or, in any case, in virtue of interests contrasting with those of the Society.

TO such end, the employees That participate in the purchasing processes must:

- to grant suppliers and subcontractors who possess the necessary requirements equal opportunities to participate in the selection process;
- refrain from having relationships with suppliers and subcontractors for the which is note the non-existence of subjective requirements relating to professionalism and honorability;
- verify that the suppliers and subcontractors participating in the selection have the resources, including financial ones, organizational structures, capacity, systems of quality and resources adequate to the needs and image of *Maeg Costruzioni SpA.*

The Company requires suppliers and subcontractors to ensure compliance with the law and regulations regarding health and safety at work, environmental protection, as well as compliance with best practices in terms of human rights and employment relationships.

In its relations with suppliers and subcontractors, the Company must comply with the applicable legal

provisions and the contractually established conditions, as well as observe the principles of transparency and completeness of information in correspondence.
The Company shall refuse to receive money or other benefits from suppliers and subcontractors for the performance of an act of its office or contrary to the duties of its office.
Those who receive offers of this type on behalf of the Company are required to promptly inform their hierarchical superiors or the Administrative Body of the Company, which will evaluate whether to immediately suspend any relationship and, in any case, will notify the Supervisory Body.

3.1.4
Organizations policies, unions and mass- media

Maeg Costruzioni SpA does not deliver contributions, direct, indirect or in any form whatsoever, to parties, movements, committees, trade unions and political organisations, or to their representatives and candidates.
Relations with the press are handled by authorized functions and carried out in coherence with the communication policy defined by the Company.
The information provided must be true, complete, accurate, transparent and consistent with each other.
The Company's employees and collaborators must refrain from making statements or giving interviews regarding the Company to representatives of the press and other media and to any third party without prior authorization from the managers or heads of the appropriate functions.

Art. 3.2 Principles of behavior in the report interiors

3.2.1
Employees And collaborators

Maeg Costruzioni SpA recognizes the centrality of human resources, as they constitute the main success factor of the Company, in a context of mutual trust and loyalty between there same and its employees and collaborators.
Maeg Costruzioni SpA staff is employed under a regular employment contract and the employment relationship is conducted in compliance with the collective bargaining regulations of the sector and with tax, welfare and social security regulations.
The Company prohibits any form of discrimination against of the own employees and collaborators, even in the context of personnel selection.
The Company undertakes to adopt all measures necessary to avoid any form of favoritism in the personnel selection process, using objective and meritocratic criteria, respecting the dignity of the employees. of the candidates, as well as in the interest to the good progress from the Society.
Each employee is required to carry out his/her duties responsibly, honestly and diligently, in compliance with the policies and the procedures corporate.
Relationships between employees and collaborators must take place with loyalty, correctness and respect mutual, in compliance with the values of civil coexistence and personal freedom.

3.2.2
Update and training from the Human Resources

Maeg Costruzioni SpA aims to enhance its human resources, committing to maintaining constant the conditions necessary for professional growth, knowledge and skills of each individual, carrying out adequate professional training and every initiative aimed at pursuing this objective.
Through its dedicated functions and resources, *Maeg Costruzioni SpA* ensures the dissemination and promotes knowledge of this Code of Ethics and its updates.

Employees may in any case contact their superior and the Administrative Body for clarifications and explanations on the contents of this Code of Ethics.
When establishing new employment, consultancy or collaboration relationships, *Maeg Costruzioni SpA* will provide the information necessary to allow adequate knowledge of this Code of Ethics and the Organization and Management Model with which the Company is equipped pursuant to Legislative Decree no. 231/2001.

Art. 4 Forms Of protection

4.1
Protection from the competition

Maeg Costruzioni SpA recognizes that fair and equitable competition is a fundamental element for the development of the Company.
Therefore, the Company may not implement behaviors that are contrary to civil and fair competition between companies.

4.2
Protection of the environment

The activities of *Maeg Costruzioni SpA* are managed in compliance with environmental regulations and aim to ensure the correct use of available resources. The company is committed to spreading and consolidating a culture of environmental protection and pollution prevention among its employees, collaborators, suppliers and subcontractors, developing awareness of risks and promoting responsible behavior on their part.
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4.3
Protection from the privacy of employees, clients and suppliers

Maeg Costruzioni SpA undertakes to respect the protection of privacy with regard to information relating to the private sphere and opinions of each employee and, in general, of those who interact with the Company.
The Company ensures the confidentiality of the information in its possession and refrains from seeking, disseminating or using it, unless expressly authorised by the relevant owner and, in any case, in compliance with current legislation.
Respect for the dignity of the worker is also ensured through respect for confidentiality in correspondence and interpersonal relationships between employees and collaborators and through the prohibition of interference or forms of control that may harm the personality of the individual.
Any investigation that has as its object tastes, preferences, personal tendencies and, more generally, the private life of employees, collaborators, professionals, customers, suppliers, subcontractors is prohibited. With regard to the management or use of data and information electronically, employees, collaborators and all those who have access to the company IT system must comply with the provisions of the Company's IT security policies, also in order not to compromise the functionality and protection of the IT systems.

4.4
Protection of the Health and safety in the places of work

As part of its business, *Maeg Costruzioni SpA* pursues the objective of guaranteeing the safety and safeguarding the health of its employees and collaborators, also in the context of relationships with suppliers, subcontractors and Clients.
The Company is committed to spread and consolidate a culture of conscious safety, through training on the nature of risks and the promotion of responsible behavior by all personnel.
The Company works to preserve the health and safety of workers through technical, organizational and procedural preventive actions, privileging – as far as possible – objective prevention and protection systems over subjective ones.
The Company pays particular attention to compliance with safety regulations: the places, activities, systems, procedures and work equipment, including the construction sites in which the Company is called to operate,

are subject to constant evaluation and control, carried out and documented in accordance with the provisions of Legislative Decree no. 81/2008 and subsequent amendments and additions and technical regulations.

4.5
Protection from the Human Resources

Maeg Costruzioni SpA. respects and protects the dignity, health and safety of its staff.
The Company aim to protect the integrity physics and moral of employees, ensuring working conditions that respect individual dignity, in full compliance with collective and individual contracts, the Workers' Statute, company agreements and from the regulations in force in matter of safeguarding the health and safety of workers.
Maeg Costruzioni SpA ensures that no acts of violence or psychological coercion or attitudes or behaviors that are capable of harming the dignity of the person are carried out.
The Company will punish all behaviors aimed to induce or force the staff to adopt conduct that violates this Code of Ethics.

Art. 5
Fundamental Principles in the Behavior of the Recipients

The Recipients must base their activity on the principles of responsibility, legality, correctness, confidentiality, loyalty and collaboration, in full compliance with the laws in force and company procedures.
The Recipients must refrain from implementing or attempting to implement behaviors that conflict with the principles that regulate the activity of *Maeg Costruzioni SpA*, formalized in this Code of Ethics, and that may constitute the predicate crimes provided for by Legislative Decree no. 231/2001.

5.1
Responsibility

Each of the Recipients must carry out their work activity and their services with diligence, efficiency and correctness, making the best use of the tools and time at their disposal and assuming the responsibilities connected to the fulfillment, in compliance with the current legislation, as well as the procedures and skills established by *Maeg Costruzioni SpA*.
Recipients must promptly report to the competent bodies any information they have on any violation - or alleged violation - of the provisions contained in the Code of Ethics or in company procedures.

5.1.1
Responsible use of systems computer scientists

The recipients of this Code of Ethics are responsible for the security and processing of the IT systems used and are required to comply with the regulatory provisions and company procedures, as well as to comply with the conditions contained in the license agreements of the related IT programs.
Without prejudice to the provisions of applicable laws, the use of company assets is considered improper in the use of network connections (Internet) for purposes other than those strictly connected to the performance of one's work functions.
The recipients are required to take all necessary precautions to prevent the possible commission of crimes through the use of IT tools.

5 .2
Legality And Correctness

The behaviors implemented by each of the Recipients in the performance of their function or assignment must be inspired by legality, both in form and substance, correctness, collaboration, loyalty and mutual respect.

The Recipients must not use for personal purposes information, goods, equipment or materials at their disposal for the performance of their duties or assigned tasks.
They must not in any way accept or carry out, for themselves or for others, pressure or recommendations that may cause damage to *Maeg Costruzioni SpA* or may cause an undue advantage to the agent, the Company or third parties.
It follows that each Recipient must refuse and, in any case, not make undue promises and money offers or other benefits, unless the latter are of modest value and not related to requests of any kind.
The Recipients who receive from a third party an offer or request for benefits, with the exception of commercial gifts or gifts of modest value, must not accept a similar offer, nor accept such a request and must promptly and comprehensively inform their hierarchical superior or the Administrative Body of *Maeg Costruzioni SpA*, which will verify its validity and, in any case, will not communicate it to the Supervisory Body.

5.2.1
Conflict of interest

In carrying out the activity for which they are responsible or the assignment attributed They, the Recipients pursue the objectives and general interests of *Maeg Costruzioni SpA*, in compliance with the laws in force and the present Code of Ethics.
The Recipients must inform the Administrative Body of *Maeg Costruzioni SpA* of the situations in which they could be owners of interests in conflict with those of the Company, or if of such interests are holders of their closest relatives, as well as any other case in which there are reasons of convenience such that they must be held in due consideration to the ends of the respect of this Code of Ethics.
The Recipients must respect the decisions taken in this regard by *Maeg Costruzioni SpA*, abstaining, in any case, from carrying out operations that present connotations of conflict of interest.

5.3
Confidentiality

The Recipients are required to ensure maximum confidentiality with regard to news and information forming part of the company assets, or relating to the activity of *Maeg Costruzioni SpA*, in compliance with legislative and regulatory provisions, this Code of Ethics and company procedures.

5.4
Loyalty And Collaboration

The Recipients, without distinctions or exceptions, are required to observe and ensure that relations are observed of business imprinted to criteria of loyalty, irreproachability, collaboration and mutual deference, in order to guarantee the continuity of relationships of trust and cooperation with internal and external interlocutors of the Company, for mutual benefit and effective growth.

Art. 6 System Sanctioning

Compliance with the provisions of this Code of Ethics must be considered an essential part of the contractual obligations undertaken by the Recipients, the violation of which will constitute an express termination clause of the contracts themselves.
With respect to employees, violation of the provisions of this Code of Ethics will constitute a breach of the obligations inherent to the employment relationship, pursuant to and for the purposes of art. 2104 of the Civil Code, or a disciplinary offence, pursuant to art. 7 of the Workers' Statute, with all legal consequences, including with regard to the maintenance of the employment relationship, and may entail the obligation to compensate the Company for any damages arising.
For a more detailed specification of the disciplinary measures that can be imposed, please refer to the sanctioning system identified in the Organization and Management Model that the Company has in place pursuant to Legislative Decree no. 231/2001.