Special Section A

CODE OF ETHICS
Mita India Pvt.Ltd

SECTION I – INTRODUCTION

ETHICS AND LEGALITY

Ethics and legality have always been fundamental values of our company.
MITA INDIA operates in full compliance with the law and promotes a corporate culture that respects colleagues, their rights and company regulations.

PEOPLE

People are a fundamental asset to the company.
Valuing our human capital and investing in individuals' knowledge and personal development is a key objective and a defining feature of our company.
Training is one of the most powerful tools for achieving the stated objective; it is essential for fostering personal and professional development.

CONTENTS

The MITA INDIA Code of Ethics:

- sets out the Company's rights, duties and responsibilities in relation to all parties with whom it interacts in pursuit of its corporate purpose (contracting authorities, suppliers, employees and/or contractors, shareholders, institutions); is therefore a set of guidelines whose rules of conduct must be borne in mind in day-to-day work and which presupposes, *first and foremost*, compliance with applicable laws and regulations, including the Company's internal rules;
- it aims to establish ethical 'standards' and rules of conduct to guide the Company's decision-making processes and conduct;
- requires *management* and all those to whom it applies to behave consistently, that is, to take actions that do not, even in spirit, conflict with the company's ethical principles;
- contributes to the implementation of the Company's social responsibility policy, as it recognises that taking social and environmental concerns into account helps to minimise exposure to *compliance* and reputational risks, whilst strengthening the sense of belonging amongst its stakeholders.

SECTION II – IMPLEMENTATION PROCEDURES

Article 1: ADOPTION AND UPDATING
This Code is adopted by resolution of the Board of Directors of MITA INDIA, dated _________ – far from being regarded as an unalterable document – it should be viewed as a tool subject to subsequent amendments and additions in light of changes both within and outside the Company, as well as the experience gained by the Company over time. This is to ensure full consistency between the guiding values adopted as the Company's fundamental principles and the conduct to be observed in accordance with the provisions of this Code.
MITA INDIA's Code of Ethics is based on Confindustria's Guidelines for the development of organisational, management and control models *pursuant* to Legislative Decree 231/2001, updated in June 2021.

Article 2: APPLICABILITY
This Code is binding on shareholders, members of the corporate bodies, senior management, employees, as well as on all those who, although external to the Company, work for it, either directly or indirectly.
All the Addressees indicated above are therefore required to comply with, and, within the scope of their responsibilities, to ensure compliance with, the principles contained in the Code of Ethics. Under no circumstances does the claim to be acting in the Company's interests justify conduct that is contrary to that set out in this document.
Compliance with the provisions of the Code must, furthermore, be regarded as an essential part of the contractual obligations of the Company's employees pursuant to and for the purposes of the provisions set out in Article 2104 et seq. of the Civil Code.

Article 3: CODE OF ETHICS and ORGANISATIONAL AND MANAGEMENT MODEL
The Company's Organisation and Management Model complies with the requirements set out in this Code of Ethics, which forms an integral part thereof. In this regard, in fact:
- the Code of Ethics is adopted voluntarily by the Company and sets out the values and principles of conduct recognised as its own, which all addressees are required to observe, constituting the primary means of preventing any offence;
- the Organisation and Management Model pursuant to Legislative Decree 231/01, inspired by the principles of the Code of Ethics, meets specific legal requirements, with a view to preventing the commission of particular types of offences.

The Company strives for continuous operational improvement and the enhancement of internal procedures in order to make corporate management more effective and efficient by encouraging, amongst other things, the use of IT tools, so as to reduce repetitive and purely administrative tasks in favour of those requiring a higher level of professional expertise, ensuring the timely and prompt handling of requests from all customers and collaborators, whilst strictly complying with regulations; Through this, the Company pursues the exclusive interests of the business and its shareholders.

Article 4: TRAINING ACTIVITIES
Initiatives aimed at promoting awareness of the values and standards of conduct set out in this Code of Ethics will be included in the annual training plan.
A training programme on the contents of the Code of Ethics is provided for new recruits as part of the induction courses.
Training on the Code of Ethics is normally carried out in conjunction with training on the Model 231 adopted by the company and the regulations governing the administrative liability of legal persons.

SECTION III – GENERAL PRINCIPLES

Article 5: VALUES
SOME EXAMPLES OF REASONS TO SPEAK UP OPENLY:

- Corruption
- Gifts, perks, or other favors intended to gain improper influence
- Price fixing, bid rigging, or sharing sensitive information with competitors
- Environmental protection violations
- Doing business with countries, companies, or individuals in violation of U.S. sanctions
- Violations of regulations for business operations such as insurance, public utilities, and transportation
- Insider trading
- Conflicts of interest created when personal relationships interfere with obligations to the company
- Misrepresentations to customers or vendors
- Inaccurate books and records; falsification or destruction of company documents or reports to regulators
- Fraud, theft, or misuse of company assets
- Discrimination or harassment based on disability, race, ethnic origin, religion, or sex
- Bullying or offensive behavior
- Retaliation for reporting an integrity concern

The actions, operations, transactions and, in general, all conduct of the Addressees in the performance of their duties and responsibilities must be characterised by the utmost integrity, honesty, fairness, loyalty, transparency, equity and objectivity, as well as respect for others and responsibility in the prudent use of the company's assets and resources, including environmental and social resources.
Everyone, within the scope of the responsibilities associated with their role, must demonstrate the highest level of professionalism at their disposal to meet the needs of customers and internal users appropriately.
It is essential that everyone carries out their assigned tasks with commitment, making a tangible contribution to the achievement of the company's objectives and to upholding the values set out.
Fostering a sense of belonging to the Company and enhancing its corporate image are shared objectives that consistently guide

Article 6: INTEGRITY, HONESTY, FAIRNESS AND LOYALTY
Respect for the values of integrity, honesty, fairness and loyalty entails, amongst other things, that the Company is committed to:

- promoting and requiring compliance with internal regulations and/or all applicable laws by staff, collaborators, customers, suppliers and any other third party with whom it has a legal relationship;
- to strictly comply with current anti-money laundering legislation, and in any event to refuse to carry out any transaction that is suspect in terms of fairness and transparency;
- to promote, at all levels, practices aimed at preventing local corruption;
- to ensure and promote, within the organisation, compliance with all the requirements set out in the Organisation and Management Model drawn up for the purpose of preventing the commission of offences under Legislative Decree 231/01;
- to record each transaction only where supported by appropriate documentation, so that checks may be carried out at any time to verify its nature and reasons and to identify who authorised, carried out, recorded and verified the transaction; Consequently, employees and/or contractors must carry out all accounting entries accurately, promptly and comprehensively, scrupulously complying with civil and tax legislation as well as internal accounting procedures. Every entry must accurately reflect the data contained in the supporting documentation, which must be carefully retained in case of any audit. The reliability of management data and the correct and timely recording thereof, enabling the overall financial position of the company to be reconstructed retrospectively, represent one of the objectives

consistently pursued by the Company;

- to prevent the formation within the Company of groups, comprising three or more people, with the specific aim of engaging in conduct that is unlawful under the law.
- to prevent any action that depletes the company's assets, carried out with the aim of evading the payment of tax liabilities.

Article 7: FAIRNESS, OBJECTIVITY AND PROTECTION OF THE INDIVIDUAL; COMBATING DISCRIMINATION

The Company regards the protection of personal safety, freedom and individual dignity as an essential value. It therefore rejects any activity that may result in harm to personal safety, as well as any form of exploitation or subjugation of the individual.

Furthermore, the Company condemns any conduct aimed at facilitating the illegal entry of a foreign national into the territory of Italy or into another State of which the person is not a citizen or does not hold permanent residence status, with a view to deriving even indirect profit therefrom.

The Company distances itself from and firmly condemns all forms – including incitement, propaganda and instigation – of discrimination or violence on racial, ethnic, national or religious grounds.

The Company also attaches the utmost importance to the protection of minors and to combating any form of exploitation of minors.

To this end, the misuse of IT tools is therefore prohibited and entirely at odds with the Company's values; in particular, any use of such tools aimed at carrying out or even merely facilitating conduct relating to the offence of child pornography, including where such conduct involves virtual images.

Furthermore, in order to ensure full respect for the individual, the Company is committed to complying with, and ensuring that its employees, suppliers, contractors and partners comply with, current legislation protecting workers, with particular attention to child labour and working conditions, social security and pay.

Any employee who, in the course of their work, becomes aware of acts or conduct that may undermine personal safety as defined above, or that constitute exploitation or the subjugation of a person, or conduct aimed at discrimination, must, subject to legal obligations, immediately report this to their superiors and to the Supervisory Body.

Furthermore, respect for the values of fairness and objectivity requires the Company to commit to:

- to avoid all forms of discrimination, in particular that based on race, nationality, gender, age, physical disability, sexual orientation, political or trade union views, philosophical beliefs or religious convictions;
- not to tolerate sexual harassment or physical or psychological abuse, in whatever form or context they may occur;
- to listen to the requests of colleagues, customers and suppliers without any preconceptions or behaviour aimed solely at defending one's own position and actions;
- to avoid, in the performance of their duties, making decisions or carrying out activities that are contrary to or in conflict with the company's interests or that are otherwise incompatible with the fulfilment of their professional obligations;
- to show sensitivity and respect towards others by refraining from any behaviour that might be considered offensive;
- to condemn any behaviour intended to encourage pornography, including child pornography;
- to condemn any behaviour aimed at facilitating illegal immigration, the illicit trafficking of narcotic and psychotropic substances, and the smuggling of tobacco;
- to condemn the exploitation of workers in any form.

Article 8: TRANSPARENCY AND CONFIDENTIALITY

Adherence to the principles of transparency and confidentiality requires the Company to:

- to disseminate accurate, complete, transparent and comprehensible information, so as to enable recipients to make informed decisions;
- to update, disseminate and enforce the 'Policy' issued by the Company regarding the management,

processing and disclosure to third parties of confidential information, and to ensure that recipients comply with it;
- to protect the confidentiality of data and information that employees and/or associates of the Company may hold, particularly where such data and information, if made public, could influence the price of financial instruments. Members of the administrative and supervisory bodies, employees and contractors must be fully aware that they are prohibited from carrying out trading or other transactions, including through a third party, or from advising others to carry out such transactions, by exploiting information known to them by virtue of their work;
- to regard confidentiality as the cornerstone of the Company's operations, which is fundamental to the Company's reputation and the trust that its customers place in it. The Company's employees and/or contractors are required to adhere strictly to this principle, even after the termination of their employment or contractual relationship, however that may have occurred. It is therefore expressly prohibited to disclose, disseminate or misuse data, information or confidential details concerning customers or third parties in general with whom the Company maintains, or is about to maintain, business relations. Personal data may only be disclosed to those who have a genuine need to know such information in order to carry out their specific duties. Any person who has dealings with the Company must avoid the unauthorised disclosure or dissemination of such data and/or information.

It is therefore prohibited:
- in financial statements, reports or other corporate communications required by law, addressed to shareholders or the public, to present material facts that are untrue or to omit information which is required by law to be disclosed regarding the Company's economic, asset or financial position (even if the information relates to assets owned or managed by the Company on behalf of third parties), in a manner likely to mislead the recipients regarding the aforementioned situation, potentially causing financial loss to shareholders or creditors, with the intention of deceiving shareholders or the public and for the purpose of obtaining an unjust profit for oneself or others;
- in reports or other corporate communications, whilst being aware of the falsity and with the intention of deceiving the recipients of the communications, making false statements or concealing information concerning the Company's economic, equity or financial position, in a manner likely to mislead the recipients of the communications regarding that position, with the aim of obtaining an unjust profit for oneself or for others;
- concealing documents or, by other appropriate means, preventing or otherwise obstructing the performance of the control or audit activities legally assigned to shareholders and/or other corporate bodies;
- distributing profits or interim dividends on profits not actually realised or allocated by law to reserves, or distributing reserves – including those not formed from profits – which may not be distributed by law;
- except in cases permitted by law, to acquire or subscribe for shares or equity interests, thereby causing damage to the share capital or to reserves that may not be distributed by law;
- in breach of the statutory provisions protecting creditors, to carry out reductions in the share capital, thereby causing harm to creditors;
- fictitiously forming or increasing the Company's share capital, even in part;
- causing harm to creditors by distributing the company's assets amongst the shareholders before paying the company's creditors or setting aside the sums necessary to satisfy them;
- through simulated or fraudulent acts, securing a majority at a general meeting with the aim of procuring an unjust profit for oneself or others;
- spreading false information, or carrying out simulated transactions or other manoeuvres specifically designed to cause a significant alteration in the price of financial instruments.

Any Addressees who become aware of omissions, falsifications or negligence in the accounts or in the documentation on which the accounting records are based are required to report the facts to the Supervisory Body.

Article 9: RESPONSIBILITIES

Each Addressee shall carry out their work and duties with diligence, efficiency and integrity, utilising the resources and time at their disposal in the most appropriate manner and assuming the responsibilities associated with the tasks within their remit.

Anyone holding the role of manager, supervisor or executive must set an example, provide *leadership and* guidance in accordance with the principles of business conduct set out in the Code and, through their behaviour, must demonstrate to employees and collaborators that compliance with the Code is a fundamental aspect of their work and that of the employees and collaborators, ensuring that employees and collaborators are aware that business results must never be separated from compliance with the principles of the Code.

Respect for the value of responsibility means that the Company’s activities are carried out:

- guided by the principles of sound and prudent management, with the aim of being a solid, reliable and transparent company, open to innovation, responsive to customers’ ever-changing needs, attentive to the requirements of shareholders, and committed to the optimal development and utilisation of human resources and the most efficient corporate organisation;
- pursuing the Company’s interests in compliance with laws and regulations, and through fair and honest conduct, recognising competition as a positive stimulus for the constant improvement of the quality of products and services offered to customers, and basing its commercial conduct on the principles of loyalty and fairness;
- safeguarding the company’s reputation and assets;
- seeking to reconcile economic initiative with environmental requirements, not only by complying with current legislation but also by drawing on best practice in this field;
- supporting the social and economic growth of the local communities where the Company is based, including through cultural and sporting initiatives and support for disadvantaged groups.

Article 10: MANAGEMENT OF MATTERS RELATING TO NEGLIGENT OFFENCES CONCERNING HEALTH AND SAFETY AT WORK

The company must clearly set out and publicise, by means of a formal document, the fundamental principles and criteria on the basis of which decisions of all kinds and at all levels are taken regarding health and safety at work.

These principles and criteria can be summarised as follows:

- avoid risks;
- assess risks that cannot be avoided;
- tackling risks at source;
- adapting work to the individual, particularly with regard to the design of workstations and the choice of work equipment and working and production methods, in particular to alleviate monotonous and repetitive work and to reduce the effects of such work on health;
- take account of technical progress;
- replace hazardous elements with non-hazardous or less hazardous alternatives;
- plan prevention, aiming for a coherent, integrated approach that incorporates technology, the organisation of work, working conditions, social relations and the influence of factors in the working environment;
- give priority to collective protection measures over individual protection measures;
- provide workers with adequate instructions.

These principles are used by the Company to take the necessary measures to protect the health and safety of workers, including activities relating to the prevention of occupational risks, information and training, as well as the establishment of the necessary organisation and resources.

The Company, at both senior and operational levels, must adhere to these principles, particularly when decisions are to be taken or choices made, and subsequently when these are to be implemented.

The Company's primary objective is to create the best possible 'workplace atmosphere' with a view to enhancing well-being and, consequently, improving productivity, as well as achieving a desirable reduction in accidents.

In order to better structure and support the occupational health and safety management system, the Company has clearly defined the chain of responsibility, starting with the appointment of safety representatives.

Article 11: MANAGEMENT OF THE COMPANY'S ACTIVITIES IN RELATION TO ENVIRONMENTAL OFFENCES

The Company is committed to protecting the environment, with the aim of continuously improving its environmental performance.

To this end, its commitments include:

- compliance with national and EU environmental legislation and regulations;
- the prevention of pollution;
- raising awareness of environmental issues amongst shareholders, employees and contractors;
- an approach to project planning aimed at minimising the environmental impacts that may result from the design choices made.

Consequently, those to whom this Code of Ethics applies are required to adhere to the following standards of conduct:

- to conduct business activities with the utmost respect for the protection of:
- water, air, soil and subsoil;
- ecosystems, biodiversity (including agricultural biodiversity), flora and fauna;
- not to carry out any activity relating to environmental protection in breach of, or without, the required authorisation;
- not to transfer, receive, transport, import, export or procure for third parties, hold, transfer, abandon or unlawfully dispose of highly radioactive material;
- to take prompt and immediate action to carry out remediation and restoration work where situations arise that are harmful to the environment in general;
- except in permitted cases, not to kill, capture or keep specimens belonging to a protected wild animal species;
- except where permitted, not to destroy, remove or keep specimens belonging to a protected wild plant species;
- except where permitted, not to destroy a habitat within a protected site or, in any event, not to damage it in a way that compromises its conservation status;
- do not discharge industrial waste water without authorisation, or after such authorisation has been suspended or revoked;
- do not carry out activities involving the collection, transport, recovery, disposal, trade or brokering of waste without the required authorisation;
- do not cause pollution of the soil, subsoil, surface water or groundwater by exceeding the risk threshold concentrations and, where necessary, carry out remediation;
- when preparing a waste analysis certificate, provide accurate information on the nature, composition and chemical and physical characteristics of the waste in question;
- not to engage in the illegal trade in waste;
- not to exceed the air quality emission limit values laid down in authorisations, requirements and current legislation;
- not to import, export, transport, possess, use for profit, purchase, sell, display or hold for sale or for commercial purposes specimens listed in EC Regulation No 338/97 in the absence of, or in

contravention of, the required certificates or licences; not to offer for sale or otherwise dispose of the aforementioned specimens without the required documentation;
- not to keep live specimens of wild mammals and reptiles, or live specimens of mammals and reptiles bred in captivity, which pose a danger to public health and safety.

The Company is convinced that, in order to safeguard the environment and preserve our natural heritage, we must act responsibly in our day-to-day activities.
To this end, the collaboration and involvement of the entire supply chain is essential to ensure that our actions are truly sustainable.
The Company therefore requires its suppliers to undertake to:
- reduce waste production and, in all cases, prioritise separate waste collection;
- reduce the use of natural resources (electricity, water, gas), particularly whilst carrying out work at the Company's sites;
- reduce the waste of virgin resources and raw materials;
- reduce pollutant emissions into the air, water and soil;
- reduce noise emissions;
- reduce the hazardous nature of the substances used;
- give preference to energy-efficient tools and equipment;
- operate in a way that minimises risks to the environment and human health.

SECTION IV – CODE OF CONDUCT

Article 12: RELATIONS WITH STAFF – COMBATING ALL FORMS OF EXPLOITATION

The Company, recognising its staff as a fundamental and indispensable factor in the Company's development, considers it important to establish and maintain relationships with employees and collaborators based on mutual trust.

Consequently, the Company is committed to developing its staff's skills and potential in the performance of their duties, so that the abilities and legitimate aspirations of individuals are fully realised within the context of achieving the Company's objectives.

The operations of all the Company's departments, and in particular the department responsible for human resources management, must be guided by these principles.

The Company is committed to offering equal opportunities for employment and professional development to all employees on the basis of their professional skills and qualifications, without any discrimination, nor any form of nepotism or favouritism.

In particular, at the time of recruitment, candidates are assessed on the basis of their suitability for the roles required by the Company. Staff are employed solely under valid employment contracts; no form of irregular employment is tolerated. Candidates must be made fully aware of all the terms and conditions relating to the employment relationship.

Upon commencement of the employment relationship, staff receive clear and specific information on regulatory and remuneration matters. Furthermore, throughout the duration of the employment relationship, employees or contractors receive guidance enabling them to understand the nature of their role and to perform it appropriately, in accordance with their qualifications.

The Company is committed to providing training for all employees and to encouraging their participation in refresher courses and training programmes so that the skills and legitimate aspirations of individuals can be realised in tandem with the achievement of the Company's objectives.

It follows that:

- the Company, through the relevant departments, selects, recruits, remunerates and manages staff on the basis of merit and competence;
- the company's performance appraisal system is managed in a transparent and objective manner.

The Company requires that its suppliers and partners also strictly comply with current labour legislation, paying particular attention to child labour, women's employment, working conditions and hours, and social security, contribution and wage arrangements.

The Company firmly opposes the practice of 'caporalato'.

The Company applies labour legislation and the provisions of national and second-level collective agreements.

The Company undertakes to comply with the following requirements:

- not to use child labour or forced labour;
- to respect freedom of association and the right to collective bargaining;
- to ensure working conditions that protect workers from potential injuries and illnesses, with a view to the full satisfaction of its staff;
- to combat all forms of discrimination and ensure equal opportunities and fair treatment for all employees, regardless of race, social class, national origin, religion, disability, gender, sexual orientation, trade union membership, political affiliation or age;
- to carry out recruitment by taking into account solely objective criteria such as competence, experience and education in relation to the roles to be filled;
- to apply the national collective labour agreement fully and impartially to all employees, paying the agreed remuneration on time;
- to contribute to the personal development of staff and to guarantee stable employment, as well as

providing education and training in line with individual needs and organisational and managerial requirements;
- to grant promotions based on individual abilities and organisational and managerial needs;
- to guarantee protection for mothers and fathers, as well as for disadvantaged people;
- to implement retirement arrangements in accordance with the relevant legislation in force;
- carry out any dismissals only in cases permitted by law and the National Collective Labour Agreement (CCNL), and in no circumstances on discriminatory grounds.

The Company guarantees all employees fair and decent pay in accordance with the provisions of the National Collective Labour Agreement (CCNL) and supplementary agreements.
Pay slips clearly set out all items relating to entitlements and deductions made.

The Company requires that its suppliers and partners also strictly comply with current labour legislation, paying particular attention to child labour, women's employment, working conditions and hours, and social security, contribution and wage arrangements.

Article 13: OBLIGATIONS OF STAFF

The professionalism and commitment of staff constitute a specific obligation, as they are essential prerequisites for achieving the Company's objectives. Employees and contractors may not be exempted from compliance with the provisions of this Code of Ethics.
In particular, they undertake to act with diligence and loyalty in accordance with the following rules of conduct:
- any personal situation or activity that could lead to conflicts of interest, even potential ones, with the company, or that could interfere with the ability to make impartial decisions in the best interests of the Company, must be avoided;
- staff are prohibited from accepting, even indirectly, money, gifts, goods, services, benefits or favours in connection with dealings with any third party with whom the Company has an existing relationship, with a view to influencing that party's decisions, in order to obtain more favourable treatment or undue benefits, or for any other purpose;
- any requests or offers of money, gifts or favours of any kind received by staff, as set out in the previous point, must be promptly reported to their line manager and the Supervisory Body;
- information acquired in the course of carrying out assigned tasks must remain strictly confidential and be appropriately protected in accordance with the provisions of the European General Data Protection Regulation (GDPR), and must not be used, communicated or disclosed to third parties;
- to cultivate their skills and professionalism, enriching them through the experience and collaboration of colleagues, thereby creating an environment in which all colleagues feel welcome and encouraged to achieve their professional goals;
- the work of every employee and collaborator within the operational, management or sales network must be characterised by the utmost cooperation with a view to achieving customer satisfaction;
- decisions taken must be based on principles of sound and prudent management, through the careful assessment of potential risks, in the knowledge that one's choices contribute to the achievement of positive business results;
- every individual is required to act with due diligence to safeguard the company's assets, using the resources entrusted to them conscientiously and responsibly, and avoiding any misuse that may cause damage or reduce efficiency, or which is otherwise contrary to the company's interests;
- Cooperation with the judicial authorities must always be provided in the context of investigations and proceedings conducted by them; specifically, it is prohibited to:
  - exerting pressure of any kind on a person summoned to give evidence before the judicial authorities, with the aim of inducing them not to give evidence or to give false evidence;
  - to assist anyone who has committed a criminal offence in evading the judicial authorities' investigations or in eluding their search.

Article 14: RELATIONS WITH POLITICAL AND TRADE UNION ORGANISATIONS
The principles of transparency, independence and integrity must also characterise the relations maintained by the relevant company departments with political and trade union organisations. Relations with these organisations are based on fostering constructive dialogue, without any discrimination or unequal treatment, with a view to promoting a climate of mutual trust and robust dialogue in the search for highly flexible solutions.
Relations with representatives of political and trade union organisations are the sole responsibility of the relevant company departments authorised to do so.
The participation, in a personal capacity, of those subject to the Code of Ethics in political organisations takes place outside working hours and without any connection to their role within the Company.
The Company does not support events or initiatives that have an exclusively political purpose; furthermore, it refrains from exerting any direct or indirect pressure on political figures and does not permit the making of direct or indirect contributions, whether in cash, in kind or in any other form, to political parties, movements, committees and political and trade union organisations, nor to their representatives, nor to associations with which a conflict of interest may be identified.

Article 15: CONDUCT OF THE CORPORATE BODIES
The corporate bodies, mindful of their responsibilities, are required not only to comply with the law, current regulations and the Articles of Association, but also to observe the provisions and principles of this Code of Ethics. In particular, their members are required:

- to conduct themselves in a manner characterised by autonomy, independence and fairness in their dealings with public institutions, private entities, business associations, political groups and any other national or international entities;
- to conduct themselves in a manner characterised by integrity, loyalty and a sense of responsibility;
- to ensure regular and informed participation in the meetings and activities of the corporate bodies;
- to assess situations involving conflicts of interest or incompatibility of functions, roles or positions both within and outside the Company, and to refrain from acting in situations of conflict of interest in the course of their duties;
- to treat as confidential any information of which they become aware in the course of their duties, and to refrain from using their position to obtain personal advantages, whether direct or indirect;
- to comply with requests for information regarding the application of specific regulations to the Company;
- to ensure that, in relation to a specific item on the agenda, only true, complete and unaltered documents and records are submitted to the Shareholders' Meeting;
- not to acquire or subscribe to shares or reserves that are not distributable by law;
- not to carry out reductions in share capital, mergers with other companies or demergers that could cause harm to creditors.

Article 16: CONFLICT OF INTEREST
A conflict of interest arises when a person's private interest, whether financial or otherwise, interferes, or appears reasonably likely to interfere, in any way with the interests of the company.
For example, a conflict of interest may arise when an employee, officer or director takes action or has an interest that could make it difficult for them to carry out their duties objectively and effectively. Written policies and procedures cannot address every potential conflict, so it is necessary to use common sense in identifying and responding appropriately to actual or apparent conflicts.
Conflicts of interest include, for example:

- involvement, whether for remuneration or not, in any entity that is a current or potential competitor, customer, supplier or business counterpart of MITA INDIA
- transactions or business activities involving a relative (defined as a person related to another by blood or marriage, including by marriage) or someone with whom a MITA INDIA employee has a personal relationship, including potential employment.

MITA INDIA employees must never take advantage of business opportunities arising from the use of company property, information or positions for personal gain.

Article 17: RELATIONS WITH CUSTOMERS AND SUPPLIERS
The Company demonstrates constant sensitivity and attention to the quality of its relationships with clients and to their continuous improvement, as this is a necessary prerequisite for the process of creating and distributing value within the company. Clients, in fact, form an integral part of the Company's corporate assets.
In dealings with customers, each person to whom this Code applies represents the Company, of which they are an integral part. To this end, such persons are required to conduct their activities with customers with professionalism, competence, helpfulness, fairness, courtesy and transparency. The excellence of the products and services offered, and the guarantee of providing an immediate and professional response to enquiries, are the hallmarks of the Company's relationship with its customers.

All conduct must always be guided by professional respect for the confidentiality of information acquired in the course of business, as well as compliance with current legislation on the protection of personal data.

Business relationships must always be conducted in accordance with all the rules governing sound industrial and commercial practice, taking particular care to avoid any fraudulent or unlawful conduct, as well as any behaviour intended to infringe copyright laws.

In the context of commercial relations, all those working with and for MITA INDIA are required:
- to promote, in every area of activity—including commercial relations—fair and proper conduct, condemning any possible form of interference with the freedom of industry or trade, as well as any possible form of unfair competition, fraud, counterfeiting or infringement of industrial property rights, and reminding all those acting in the Company's interests to comply with existing legislation protecting authentication tools or marks, certification or recognition, for the protection of industry and trade, and in relation to copyright;
- to counter and reject any conduct aimed at obtaining confidential information relating to its competitors in the market, in compliance with current legislation on antitrust and fair competition, undertaking not to take any action that may constitute a breach of such legislation;
- to safeguard its own and others' intellectual property rights, including copyright, patents, trade marks and distinctive signs, by adhering to the policies and procedures established for their protection;
- to oppose and reject any conduct aimed at securing commercial opportunities through unlawful means, by offering or promising money or other undue benefits.

To protect the Company's image and reputation – built through the commitment, dedication and professionalism of its staff – it is essential that relations with customers are characterised by:
- full transparency and fairness, not least with a view to building a solid relationship that enables the customer to always understand the characteristics and value of all the products and services available that they purchase or are offered;
- maintaining high standards of service quality and maximising customer satisfaction. The internal procedures and IT systems used support these objectives, including through continuous monitoring of the customers themselves;
- the accurate identification of customers' risk profiles, a fundamental starting point for offering products consistent with their needs;
- to responding promptly to complaints, with the aim of reaching a substantive resolution of disputes. Complaints represent an opportunity for improvement, to resolve conflicts and restore customer trust and satisfaction;
- providing care and attention to every customer or category of customers, without any discrimination on the basis of their nationality, religion or gender;
- the development of a pricing policy in line with the quality of the service provided;

- a commitment to making its centres and services accessible to people with disabilities, by removing any architectural barriers;
- compliance with the law, with particular reference to anti-money laundering provisions, as well as the fight against the handling of stolen goods and the use of money, assets or benefits of illicit origin;
- independence from any improper influence, whether internal or external;
- regular monitoring of the achievement of customer satisfaction and loyalty targets, which is rewarded with the aim of fostering a customer-focused culture. The Company welcomes suggestions and proposals from customers regarding its services and products.

Furthermore, when establishing business relationships with new customers and managing existing ones, it is necessary, taking into account the information available, to avoid:

- maintaining direct or indirect relationships with parties known, or merely suspected, to be involved in illegal activities, in particular those related to arms and drug trafficking, money laundering and terrorism, and, in any case, with persons who do not meet the necessary requirements of integrity and commercial reliability;
- funding activities aimed at the production or marketing of products that are highly polluting or hazardous to the environment and health;
- to engage in financial dealings with those economic activities which, even indirectly, hinder human development and contribute to the violation of fundamental human rights (for example, by exploiting child labour or workers).

With regard to relations with clients, it is prohibited for the Addressees to promise or offer clients any benefits or other advantages in order to promote or further the Company's interests when entering into commitments and/or managing relationships of any kind.
In particular, it is prohibited to:

- offering the aforementioned parties, including on festive occasions, gifts, with the exception of gifts of symbolic value directly attributable to normal relations of commercial courtesy – in compliance with current regulations – and, in any event, such that they cannot give rise, in the other party or in an unrelated and impartial third party, the impression that they are intended to secure undue advantages from the Companies or to grant such advantages to the Company, or which might otherwise give rise to the impression of illegality or immorality. To this end, the Company has implemented strict protocols, with particular reference to the public and private sectors, in order to prevent the commission of corruption offences in both the public and private spheres;
- to examine or propose, for personal gain, employment opportunities for employees and/or commercial opportunities of any other kind that might unduly benefit them, beyond the ordinary treatment accorded to customers;
- incurring unjustified entertainment expenses, or those not provided for in contracts, for purposes other than the mere promotion of the company's image.

The principles applied to relations with customers must also characterise the Company's commercial relations with its suppliers, with whom it is committed to developing relationships based on fairness and transparency.
In particular, the following are ensured:

- standard procedures for the selection and management of suppliers, ensuring they are treated with equal dignity and are afforded equal opportunities. The supplier selection process will take into account objective and transparent assessments of their professionalism and business structure, as well as quality, price, service delivery methods and delivery arrangements. Furthermore, consideration will be given to their standing in the market, their ability to meet the confidentiality obligations imposed by the nature of the service offered, as well as criteria relating to social responsibility and their compatibility and suitability with the Company's size and needs;
- criteria and systems for the ongoing monitoring of the quality of performance and of the goods and services supplied;

- supply contracts based on fairness, particularly with regard to payment terms and the administrative burden involved.

The company and its staff undertake to:
- carry out a process of selection, evaluation and management of suppliers to further the Company's interests;
- assess and select suppliers on the basis of the service offered, in terms of expertise, quality, precision of service and cost-effectiveness;
- assess and select suppliers based on their ability to comply with contractual agreements, in the absence of conflicts of interest, in accordance with the law and in line with corporate behaviour oriented towards corporate social responsibility;
- assess and select suppliers based on their capacity for innovation and their ability to act as partners in the company's development;
- not to accept money or gifts offered by external parties or by anyone who is, or intends to become, a supplier to MITA INDIA, except for those of symbolic value;
- should a supplier nevertheless wish to give a gift, this must be reported immediately to the relevant department head in order to determine the most appropriate use of the gift in accordance with company *policy*.

Adherence to the above principles is ensured through the adoption of and compliance with internal procedures governing procurement and supplier selection.
Suppliers are encouraged to conduct their business in accordance with standards of conduct consistent with those set out in the Code. In particular, they must ensure integrity in business dealings, respect the rights of their workers, invest in quality and manage environmental and social impacts responsibly.
With regard to Suppliers, it is strictly forbidden for anyone who has dealings with them to request gifts (not only in the form of sums of money, but also goods), benefits or other advantages, with the aim of facilitating their business relationship with the Company, to the detriment of others and to the detriment of the Company itself.

Article 18: RELATIONS WITH SHAREHOLDERS
In accordance with its founding values, and with a view to strengthening lasting and ongoing relationships, the Company guarantees its shareholders:
- timely and transparent communication regarding the progress of the Company's strategies and results, with the aim of providing clear, comprehensive and accurate information;
- equal access to information, as outlined in the previous point, and the utmost and consistent attention to all shareholders, without discrimination or preferential treatment;
- the widest possible participation of shareholders at General Meetings, encouraging them to exercise their voting rights in an informed manner.

Article 19: RELATIONS WITH THE PUBLIC ADMINISTRATION
The Company identifies and defines the channels of communication with all public administration bodies (by way of example only: Ministries, the Competition and Market t, the Communications Regulatory Authority, the Data Protection Authority, the Revenue Agency, etc.) at local, national and international levels.
In particular, the undertaking of commitments vis-à-vis the Public Administration (hereinafter also referred to as the PA) is reserved for the company departments designated and authorised for this purpose, which are required to carry out their duties with integrity, independence and fairness. Relationships are also characterised by the utmost cooperation, whilst ensuring that the PA's institutional activities are not hindered in any way; they are conducted by maintaining, in dealings with the PA, appropriate levels of mutual independence and avoiding any action or behaviour that could be interpreted as an attempt to improperly influence its decisions.

With regard to relations with the Public Administration, Recipients are prohibited from promising or offering to Public Officials or Public Service Officers, or to employees of the Public Administration in general, gifts (not only in the form of sums of money, but also goods), benefits or other advantages to promote or further the Company's interests when entering into commitments and/or managing relations of any kind with the Public Administration.

In particular, it is prohibited to:

- to offer the aforementioned persons, including on festive occasions, gifts, with the exception of gifts of symbolic value directly attributable to normal relations of commercial courtesy and, in any event, such that they cannot give rise, in the other party or in an uninvolved and impartial third party, the impression that they are intended to obtain undue advantages from the Company or to grant undue advantages to the Company, or which might otherwise give rise to the impression of illegality or immorality;
- to examine or propose, for personal gain, employment opportunities for public sector employees (or their relatives and close associates) and/or commercial opportunities of any other kind that might unduly benefit them, beyond the standard treatment accorded to customers;
- incurring unjustified entertainment expenses, or those not provided for in the contract, for purposes other than the mere promotion of the company's image;
- provide or promise to provide, solicit or obtain confidential information and/or documents, or information and/or documents that could otherwise compromise the integrity or reputation of one or both parties;
- favouring, in procurement processes, suppliers and sub-suppliers solely because they have been designated by public administration employees themselves as a condition for the subsequent performance of activities;
- knowingly producing documents that are false or contain false or altered data, withholding or omitting documents, or omitting required information, with the aim of unduly influencing the decisions of the Public Administration in one's own favour or that of one's clients;
- engaging in deceptive conduct that may mislead the Public Administration in its technical and economic assessment of the products and services offered or supplied, or unduly influence the Public Administration's decision;
- using or submitting false statements or documents, or those attesting to untrue matters, or omitting required information, in order to unduly obtain grants, funding, subsidised loans or other similar payments from the State, the European Communities or other public bodies;
- offering, soliciting or accepting bribes, as well as committing acts of corruption;
- exploiting a relationship with a public body, or with any party which, in turn, has or claims to have links with representatives of the public administration, in order to obtain undue advantages.

Recipients are required to ensure that public funds, grants or subsidised loans provided to the Company are used for the purposes of carrying out the activities or implementing the initiatives for which they were granted; any use other than that for which they were provided is prohibited.

Anyone who receives explicit or implicit requests or offers of benefits of any kind from Public Officials or Public Service Employees must immediately:

- suspend all contact with them;
- report the incident to their immediate superior and inform the Supervisory Body in writing.

With regard to relations with national, EU and foreign supervisory authorities and, in particular, when making periodic communications and reports, the Company guarantees the completeness and integrity of the information provided and the objectivity of its assessments, whilst endeavouring to fulfil the obligations required of it by the public administration in a timely manner. Furthermore, relations with the Supervisory Authorities are also characterised by the utmost cooperation, taking care, in all cases, not to hinder their institutional activities.

In dealings with the tax authorities – including during audits – the utmost cooperation and transparency must be maintained.

Article 20: RELATIONS WITH THE MEDIA

The Company recognises the fundamental role played by the mass media in informing the public. To this end, it undertakes to cooperate fully with all media organisations, without discrimination, whilst respecting each other's roles. The Company's communications to any media organisation must be truthful, clear, transparent, unambiguous and not manipulative; they must also be consistent, uniform and accurate, in line with the Company's policies and programmes.
Relations with the press and other mass media are the sole responsibility of the designated corporate bodies and departments.
In order to ensure consistent messaging and to support those who liaise with the media, any statements made on behalf of the Company must be subject to prior authorisation by the relevant corporate bodies and departments.
The Company's promotional activities shall respect the ethical values set out in this Code, rejecting the use of vulgar or offensive messages. The Company ensures that the information published on its corporate website is comprehensive, effective and in line with market expectations.

Article 21: RELATIONS WITH COMPETITORS

It is of fundamental importance that the market is based on fair competition. The Company and its employees are therefore committed to the strictest compliance with competition and market protection laws in any jurisdiction.
No employee may be involved in initiatives or contacts with competitors (e.g. price-fixing agreements) that could be perceived as a breach of competition and market protection regulations.
In its activities, the Company regards compliance with *antitrust* legislation as a primary requirement, with a view to ensuring the proper functioning of competitive dynamics in the markets, economic efficiency and, consequently, virtuous processes of innovation and price reductions for goods and services, such as to ensure the greatest possible well-being for the community.
For this reason, any behaviour or conduct by companies which, by reducing competitive pressure through mergers, abuses of a dominant position or cartels, may prevent or hinder competition amongst market operators is prohibited.
More specifically, the following are prohibited:

- agreements (arrangements, concerted practices between competing undertakings and decisions by associations of undertakings) which have as their object or effect the prevention, restriction or distortion of competition in the relevant market;
- the abuse of a dominant position in the market, which may, for example, be perpetrated through: excessively onerous pricing policies; particularly onerous contractual terms; tying practices; abusive discounts; predatory pricing; margin squeezing; predatory conduct.

Article 22: MANAGEMENT OF DOCUMENTS AND IT SYSTEMS

The falsification, in form or content, of public or private electronic documents is prohibited. Any form of use of false electronic documents is also prohibited, as is the suppression, destruction or concealment of genuine documents.
It is prohibited to gain unauthorised access to a computer or telecommunications system protected by security measures, or to remain within such a system against the express or implied will of the system's owner.
It is prohibited to unlawfully retrieve, reproduce, disseminate, deliver or communicate codes, passwords or other means suitable for accessing a protected computer or telecommunications system, or even merely to provide information or instructions suitable for that purpose.
It is prohibited to procure, produce, disseminate, deliver or, in any way, make available to the company or third parties equipment, devices or programmes capable of damaging another person's computer or

telecommunications system, the information contained therein, or of altering its operation in any way.
It is prohibited to intercept, prevent or interrupt communications relating to one or more telecommunications or computer systems.
It is also prohibited to disclose, even in part, the content of any intercepted information to third parties.
It is also prohibited to install equipment designed to prevent, intercept or interrupt the aforementioned communications.
The destruction, damage, deletion, alteration or suppression of computer or telecommunications systems and of the information, data or programmes contained therein – whether privately owned or used by the State, by another public body or pertaining to it, or otherwise of public utility – is prohibited.

Article 23: PROTECTION OF TRADEMARKS, PATENTS AND COPYRIGHT
It is prohibited to counterfeit or alter national or foreign trade marks or distinctive signs relating to industrial products, or to alter, or make use of, such counterfeit or altered trade marks or signs.
It is prohibited to alter domestic or foreign patents, industrial designs or models, or to use such counterfeit or altered patents, industrial designs or models.
It is prohibited to import into the territory of the State, for the purpose of making a profit, industrial products bearing counterfeited or altered national or foreign trade marks or other distinctive signs.
It is prohibited to unlawfully duplicate computer programmes or, for the same purposes, to import, distribute, sell or possess for commercial or business purposes programmes contained on media not marked by the SIAE.
It is prohibited to reproduce, transfer to another medium, distribute, communicate, present or demonstrate in public the contents of a database without the author's authorisation, or to extract or re-use the database.
It is prohibited for those subject to this Code of Ethics to:

- use other parties' trade secrets;
- engage in conduct aimed at hindering the normal functioning of the economic and commercial activities of the Company's competitors;
- carry out fraudulent acts likely to divert other parties' customers and cause harm to the Company's competitors;
- unlawfully reproduce, imitate or tamper with trade marks, distinctive signs, patents, industrial designs or models owned by third parties;
- using, in an industrial and/or commercial context, trade marks, distinctive signs, patents, industrial designs or models counterfeited by third parties;
- to import into the territory of the State, for the purpose of trade, or to hold for sale or otherwise place into circulation industrial products bearing trade marks or distinctive signs that have been counterfeited or altered by third parties.

Article 24: ACCOUNTING BOOKS AND COMPANY RECORDS
The Company shall accurately and comprehensively record all business activities and transactions, in order to ensure maximum accounting transparency towards shareholders, third parties and the relevant external bodies, and to prevent the inclusion of false, misleading or deceptive entries.
Administrative and accounting activities are carried out using up-to-date IT tools and procedures that optimise their efficiency, accuracy, completeness and compliance with accounting standards, as well as facilitating the necessary checks and verifications regarding the legitimacy, consistency and appropriateness of the Company's decision-making, authorisation and operational processes.
MITA INDIA cooperates fully at all levels, providing accurate and truthful information regarding the company's activities, assets and transactions, as well as in response to any reasonable request received from the relevant bodies.
To ensure that the accounts meet the requirements of truthfulness, completeness and transparency of the recorded data, adequate and complete supporting documentation of the activities carried out must be kept on the Company's records, so as to enable:

- the accurate accounting recording of each transaction;
- the immediate identification of the characteristics and reasons underlying the transaction;
- the straightforward formal chronological reconstruction of the transaction;
- verification of the decision-making, authorisation and execution processes, as well as the identification of the various levels of responsibility and control. Each accounting entry must accurately reflect the information contained in the supporting documentation. It is therefore the responsibility of each designated person to ensure that the supporting documentation is easily accessible and organised according to logical criteria and in accordance with the Company's regulations and procedures. No payment of any kind may be made on behalf of the Company in the absence of adequate supporting documentation. Any person, insofar as they are authorised to do so, who becomes aware of omissions, falsifications or negligence in the accounting records or supporting documentation, is required to report this promptly to their line manager. Should the report prove unsuccessful, or should the recipient feel uncomfortable approaching their line manager to make the report, they shall report the matter to the Supervisory Body.

Article 25: TAX RISK MANAGEMENT

Proper management of tax matters and full compliance with statutory obligations regarding contributions to public expenditure are fundamental for MITA INDIA, in order to contribute to the creation and maximisation of value for all its *stakeholders*, in particular for employees and contractors, shareholders and institutional partners.

In carrying out all its activities, MITA INDIA promotes and implements tax management aimed at minimising the risk of operating in breach of tax regulations, or in conflict with the principles and/or objectives of tax systems, including with a view to preventing tax disputes, whilst maintaining an attitude of transparency and dialogue with the tax authorities of the countries in which it operates.

The company does not adopt aggressive tax policies aimed at tax avoidance.

MITA INDIA applies a tax policy designed to:

- ensuring the correct and timely fulfilment of tax obligations and, more generally, *compliance* with the tax regulations applicable to MITA INDIA in the countries in which it operates;
- ensuring the proper and efficient management of MITA INDIA's tax affairs, whilst avoiding, within the limits permitted by law, double taxation and/or an unjustifiably excessive tax burden.

In this regard, MITA INDIA's tax policy is guided by the following principles:

- Corporate culture: MITA INDIA is committed to fostering the spread and ongoing development of a corporate culture centred on the management and prevention of tax risk, as well as on the principles of honesty, fairness and compliance with tax legislation;
- Tax *compliance*: in implementing its commercial and financial strategies, MITA INDIA is committed to formal and substantive compliance with the applicable laws, regulations and provisions in the geographical areas in which it operates, including in light of relevant practice and case law.
- Tax risk management: MITA INDIA adopts tools and procedures designed to facilitate the timely identification and active management of tax risks, which may also arise from processes managed on a day-to-day basis by line functions, and not merely from the management of tax compliance and obligations.
- Management of relations with tax authorities: in managing its relations with Italian and foreign tax authorities, MITA INDIA is committed to maintaining a collaborative and transparent approach, in order to ensure constructive relations and minimise any disputes.

Article 26: ANTI-MONEY LAUNDERING AND SELF-LAUNDERING

Those subject to this Code must not, in any way or under any circumstances, receive payments or accept promises of payment, nor run the risk of being implicated in matters relating to the laundering of money derived from unlawful or criminal activities, nor engage in self-laundering, that is, transferring or using sums of illicit origin in economic or financial activities by the same person who obtained such money unlawfully.

In relation to all commercial relationships entered into on behalf of the Company, the Addressees must ensure

that *partners*, customers, suppliers or third parties provide adequate guarantees of integrity and reliability.
The Company undertakes to comply with all national and international rules and regulations concerning anti-money laundering and self-laundering.

Article 27: SPONSORSHIP, DONATIONS AND GIFTS
The Company sponsors only events of a charitable, cultural or sporting nature.
Donations are made exclusively to recognised associations and foundations, as well as to duly incorporated non-profit organisations, in compliance with accounting, civil and tax legislation.
It is expressly forbidden for the Addressees of this Code of Ethics to offer, request or receive sponsorships, gifts, gratuities, remuneration or other benefits that could even be interpreted as exceeding normal commercial courtesies, or as intended to secure an undue advantage linked to the Company's activities.

Article 28: MANAGEMENT OF ELECTRONIC AND NON-CASH PAYMENT METHODS
MITA INDIA requires all recipients to comply with the specific rules laid down for the use of electronic devices, credit cards and/or other payment methods and the internet in the course of their employment, and all users are obliged to familiarise themselves with these rules; in particular:

- each internal recipient is responsible for contributing to the security of the Company's information assets, data, access codes provided and information contained in and managed via IT assets/systems;
- the IT assets/systems assigned (e.g. desktop or laptop computers, credit cards and/or other payment instruments) must be used correctly and exclusively for the performance of one's duties. These resources must be stored appropriately, and MITA INDIA must be informed promptly of any theft or damage;
- access to IT procedures and the relevant sections reserved for electronic payments is restricted to authorised personnel only and must be carried out in accordance with internal procedures for the traceability of financial flows, so as not to cause any alteration or damage to MITA INDIA's information assets;
- the prohibition on installing unauthorised software – which could potentially carry viruses – on personal computers and/or mobile phones provided to recipients, as well as on connecting unauthorised devices or tools to the MITA INDIA network;
- the obligation to safeguard one's own authentication credentials with the utmost security and confidentiality, preventing unauthorised access to them; these credentials must comply with the rules established by MITA INDIA regarding their selection and use, must be changed in accordance with the defined timeframes, and must not be disclosed in any way to unauthorised persons;
- It is prohibited to install or use any software at one's workstation without prior authorisation and without a valid user licence.

Article 29: CULTURAL HERITAGE
MITA INDIA does not hold any investments in works of art or art collections, nor does it operate in areas subject to landscape protection.
In any event, the company and all those to whom these provisions apply must act in compliance with the legal requirements for the protection of cultural and landscape heritage.
Consequently, MITA INDIA prohibits and takes action against any conduct that may cause damage to, or even merely endanger, cultural heritage, landscape heritage or works of art.

SECTION V – IMPLEMENTATION PROCEDURES

Article 30: SUPERVISORY BODY AND CODE OF ETHICS
The monitoring, implementation and compliance with this Code of Ethics are entrusted to the Supervisory Body appointed in accordance with Articles 6 and 7 of Legislative Decree 231/01. In particular, subject to the provisions set out in the specific document entitled 'Regulations of the Supervisory Body', the tasks of the Supervisory Body are as follows:

- to monitor compliance with the Code of Ethics, with a view to reducing the risk of offences under Legislative Decree 231/01 being committed;
- to oversee and coordinate the updating of the Code of Ethics, including through its own proposals for amendments and/or updates;
- to promote and monitor initiatives aimed at facilitating the communication and dissemination of the Code of Ethics amongst all parties required to comply with its provisions and principles;
- to propose an ethics training programme in accordance with the provisions of MITA INDIA's Organisational and Management Model;
- to make observations regarding any alleged breaches of the Code of Ethics of which they are aware, reporting any infringements found to the relevant corporate bodies.

Article 31: DISSEMINATION AND REPORTING
The Code of Ethics and any updates thereto are brought to the attention of all Addressees (internal and external) through appropriate communication and dissemination activities, so that the values and principles contained therein are understood and applied, and to prevent individual actions from giving rise to conduct inconsistent with the reputation profile pursued by the Company.
The Code of Ethics is published on the website, which is accessible to all.
A hard copy of the Code is provided to each director, employee or contractor upon their appointment, recruitment or commencement of their relationship with the Company, respectively. The Code of Ethics is the subject of specific dissemination campaigns aimed at customers or other interested parties, including via the press and post or by whatever means are deemed most appropriate on a case-by-case basis.
Those subject to this Code are obliged to report any instructions received that conflict with the law, employment contracts, internal regulations and this Code of Ethics.
Failure to comply with the reporting obligation is expressly subject to sanctions.
In particular, any breach of the principles and provisions contained in this Code of Ethics must be promptly reported by the Addressees, in writing, including anonymously, to the Supervisory Body or to the Head of the Department/Service, who, in turn, will directly inform the Supervisory Body.
The Supervisory Body assesses the existence and risk level of the reported breaches in relation to the company's values and applicable regulations; it also assesses breaches of the Code and the existence of any criminal conduct, always within the scope of its powers and functions pursuant to Legislative Decree 231/01.
Contact with the Supervisory Body may be made by any means, either by sending a letter by post (including internal post) or by email addressed to the email address specifically set up and reserved for the Supervisory Body.
The Supervisory Body's contact details are as follows:
- Post: MITA INDIA s.p.a. Supervisory Board – Via Gazzotti, 284
- Email: ___________________________
- *Online* platform at: ______________________

Article 32: SANCTIONS
With regard to the classification of breaches of the provisions and principles of this Code of Ethics, as well as the relevant applicable sanctions, please refer to the provisions of the Sanctions System, specifically issued by the Company, which forms an integral part of the Company's Organisational and Management Model.

In a nutshell, the Sanctions System identifies:

- the persons to whom it applies;
- the types of relevant breaches;
- the criteria for identifying and imposing sanctions;
- the types of sanctions applicable;
- the procedure for the actual imposition of disciplinary measures.

In particular, the Sanctions System, within the limits and in accordance with the requirements set out therein, applies to:

- Employees and seconded workers;
- Members of the corporate bodies;
- Auditors; Consultants (consultancy firms, solicitors, etc.); Collaborators [quasi-subordinate workers, interns, etc.]; Suppliers; other third parties who have contractual relationships with MITA INDIA (e.g. outsourcing firms, temporary employment agencies) – hereinafter referred to as 'Third Parties'.

With regard to employees, the disciplinary sanctions provided for in the relevant National Collective Labour Agreement applied by the Company shall apply, in accordance with the procedures laid down in Law No. 300 of 1970 – the so-called Workers' Statute. The disciplinary measures that may be imposed on them are:
a) a verbal warning;
b) a written warning;
c) a fine of up to 3 hours' pay;
d) suspension from work for up to 3 days.

With regard to Directors, the disciplinary measures applicable to them are a formal warning, the revocation of powers and a reduction in remuneration or, in the most serious cases, the convening of the Shareholders' Meeting to adopt a resolution for their removal.

With regard to Statutory Auditors, the disciplinary measures applicable to them are a formal warning or, in the most serious cases, the revocation of their mandate in accordance with the procedures laid down in the Civil Code.

With regard to Third Parties, any breaches of the provisions of this Code by external parties, such as collaborators, suppliers, consultants or self-employed persons, are identified *in advance* as instances of non-compliance such as to give rise to the right to automatic termination of the contract pursuant to Article 1456 of the Civil Code.

Finally, with regard to members of the Supervisory Board, the Board of Directors shall take the appropriate measures in accordance with the provisions of the Disciplinary System applicable to the respective category to which the various members belong (employees or self-employed persons) and in compliance with the rules set out in the Supervisory Board Regulations.

Furthermore, in the event of a breach of the provisions contained in the Supervisory Board Regulations by members of the Supervisory Board, the Board of Directors may impose measures including a formal warning to ensure strict compliance with the provisions, a reduction in remuneration, and the revocation of their mandate.

Article 33: *WHISTLEBLOWING*

The Company promotes the prevention and investigation of any unlawful conduct or conduct that is otherwise contrary to the Code of Ethics and the 231 Model.
With this in mind, the Company promotes a *'speak up'* culture, that is, the freedom to engage in constructive dialogue with colleagues and/or line managers where it is deemed appropriate or necessary to raise doubts or concerns, highlight problems, put forward proposals and ideas, or, more generally, express opinions aimed at improving work within the organisation.

The Company has also sought to ensure that its employees and senior management have the opportunity to report, including on a confidential basis, a possible offence, an illegal act or any irregular conduct committed by other individuals within the Company itself (‘whistleblowing’).
In particular, in accordance with the regulatory changes introduced by Legislative Decree 24/2023, which came into force on 10 March 2023, the company has established the following internal channels to enable authorised persons to make reports:
- an online channel accessible via the following link: ______________________
- a telephone channel, already operational, by calling the following number: _________________
Furthermore, the Company protects employees who have discussed matters amongst themselves or who have made a report, guaranteeing all the protective measures set out in Chapter III of Legislative Decree 24/2023, in the forms and manner provided for by that decree.
These protective measures – the right to confidentiality, prohibition of retaliation, limitation of liability and support measures – are extended to all persons listed in Article 3 of Legislative Decree 24/2023.