

Compagnia Tecnica Motori S.p.A.



CODE OF ETHICS
and
CONDUCT



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1. Introduction

Incorporated in 1958, Compagnia Tecnica Motori S.p.A. (hereinafter also referred to as "CTM" or the "Company") carries out its activity mainly at the operational headquarters of Cesano Boscone (Milan) in the following business lines:

- design, assembly, marketing, installation and assistance of generators, cogeneration units and fire pump packages;
- design, construction and installation of power plants, with specific skills in the oil & gas industry and in data centres;
- marketing of uninterrupted power supply- UPS;
- marketing of industrial and marine engines;
- marketing of spare parts and routine and special maintenance services, relating, but not exclusively, to its two business lines.

Since its incorporation, CTM has taken great care to enhance and safeguard the ethical profiles of its business . Therefore, the Company has always been committed to disseminating among its staff and all its stakeholders the values and principles on which its business is based. CTM staunchly believes that the high level ethical conduct and compliance with the laws in force are essential to defending its reputation and success in the long-term.

The Company's Code of Ethics and Conduct ("Code"), extended to all CTM Group Member Companies ("Group"), contains the set of rules that all employees must adhere to as well as the principles of correct conduct and integrity that guide the company, also establishing the CTM Group's expectations regarding the acceptable conduct of its employees and members of the Board of Directors.

The credibility and strength of the Group member company are directly affected by the trust invested by its stakeholders, employees and managers. This trust is based on the compliance with the shared fundamental principles, which serve as a pillar for all business dynamics. This Code therefore aims to ensure that each individual consistently adopts appropriate and appropriate behaviour.

Compagnia Tecnica Motori S.p.A. has therefore formalised in this document, also in application of *Legislative Decree no. 231 of 2001*, the rules of conduct underlying the operation of its business, which also refer to principles contained in national and international documents and standards, including:

- *United Nations Universal Declaration of Human Rights (1948)*
- *Italian Constitution (1948)*
- *Charter of Rights of the European Union (2000)*
- *ILO Conventions*



- *United Nations Global Compact (2004)*
- *Foreign Corrupt Practices Act (Section 15 U.S.C. § 78 dd)*
- *Bribery Act 2010 (Chapter 23)*
- *Occupational Health and Safety Assessment Series 18001- ISO 45001*
- *EU Regulation 679/2016 ("GDPR")*
- *EU Directive 2464/2022*
- *Italian Legislative Decree 24/2023*
- *EU Directive 2464/2022*

2. Reference values

This paragraph of the Code of ethics and conduct, contains the general principles that govern the Group's activities and in which the company believes, basic conduct requirements with which all employees must consistently comply.

Legality

Compliance with the principle of legality is a fundamental pillar for establishing lasting working relationships without any form of suspicion with its employees and, more broadly, with stakeholders.

It is therefore strictly forbidden to take actions that could expose the Company to risks of committing crimes and illegal conduct, including, but not limited:

- copyright offences
- offences against the trade industry
- terrorism offences
- offences of money laundering and the use of money, goods or benefits of illicit origin
- transnational crimes
- offences relating to organised crime
- corruption offences
- self-laundering offences
- possession of stolen goods offences
- offences committed in relations with the Public Administration
- cybercrime and the unlawful processing of data
- corporate offences
- crimes against individuals



- crimes of manslaughter and serious injury committed in breach of the rules on the protection of occupational health and safety
- offences of inducement not to make statements or to make false statements to the judicial authority
- environmental crimes
- the employment of illegal workers
- illegal intermediation and exploitation of labour

Consistency

For the company, operating consistently towards the principles and values set out in this Code of ethics is the fundamental prerequisite for the daily management of its activities, for the definition of its strategic planning and for the management of relations with its stakeholders.

Loyalty and integrity

The Company considers it essential to conduct relations with third parties, both internal and external, in compliance with the principles of loyalty and integrity to achieve the objectives set. This commitment reflects the Group's member companies desire to establish constructive and trust-based relationships, which are fundamental for the achievement of business success and for the protection of its reputation in the long term.

Fairness and transparency in managing relationships with its stakeholders

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The management of relations with the Company's stakeholders must be carried out with the utmost fairness and transparency. The Group's member companies undertake to disseminate this principle to their employees and collaborators and to adopt an internal control system that guarantees the completeness, reliability and timeliness of information to avoid misleading communications that may allow the Group's member companies to take undue advantage of any kind. The Group's member companies have always paid particular attention to investigating any form of fraudulent behaviour, even if only suspicious, as it is not tolerable.

Excellence of products and services provided to the Customer

The Company has always placed the satisfaction of its Customers at the heart of its business, adopting an approach aimed at understanding the different needs on a case-by-case basis and providing reliable and cutting-edge products. This commitment has helped the company to establish itself as an important international company. Through this strategy, CTM aims to establish lasting and reliable business relationships with its partners, while strengthening its position in the reference market and ensuring technologically advanced products comply with the highest international standards.

Innovation and knowledge sharing

Investments aimed at the research and innovation of its products and business processes represent a fundamental element in the Company's path of continuous improvement.



The dissemination of knowledge within the work environment and the promotion of innovative approaches among staff are two of the key principles of the company philosophy. This commitment not only fosters the development of advanced solutions, but also the strengthening of internal skills and the creation of a stimulating and collaborative work environment.

Social and environmental responsibility towards local communities

Since its incorporation, the Company has always maintained a constant, open and transparent dialogue with the local communities affected by its activity, fostering initiatives that can promote the economic, social and civil development of local communities, also undertaking not to cause any damage. In defining its strategies and policies, CTM is also committed to always putting respect for the environment at the forefront, investing in systems aimed at continuously reducing environmental emissions and increasing energy efficiency.

Respect for the person and equal opportunities

In defining and applying its company policies, CTM undertakes to repudiate any form of discrimination and intolerance of any kind (gender, race, nationality, age, political opinions, religious beliefs, sexual orientation, state of health and economic and social conditions). For this reason, CTM implements personnel selection and management processes aimed at guaranteeing equal opportunities to all employees, based on merit criteria free of any kind of favouritism, facilitation and discrimination.

The Company undertakes to allow any form of free association between workers, in compliance with the laws in force, and strongly condemns any type of slavery, human trafficking and child labour, carefully monitoring all risks associated with the violation of human rights.

Protection of health and safety in the workplace

CTM has always strived to disseminate the culture of safety among its employees and collaborators and is committed to complying with all occupational health and safety regulations and rules, striving to ensure a comfortable working environment and to protect the health and safety of all employees. To achieve this goal, CTM provides health and safety training courses, invests in management systems aimed at preventing serious and very serious accidents or injuries, and promotes initiatives aimed at raising staff awareness of the risks related to their duties. The Company has been ISO 45001:2018 certified since 2021 and continues to operate to ensure a working environment that complies with the highest international health and safety standards. Through constant monitoring and improvement of processes, it is also committed to providing its employees with services that can protect and strengthen their health and safety, thus ensuring the well-being and protection of all employees.

Information security and intellectual property rights

CTM implemented appropriate safeguards to safeguard its business information. Employees are required to engage in appropriate security measures to ensure confidentiality, take steps to prevent unauthorized access, and respect intellectual property.



3. Recipients of the Code

The principles and provisions of this Code of Ethics and Conduct are binding on all of the following recipients:

- persons who are at the top of the corporate organisation of the Group's member companies (directors, executives);
- persons who, within the corporate organisation of the Group's member companies, hold a subordinate position with respect to the former (employees);
- external collaborators who perform, directly or indirectly, services related to the business activities of individual companies (consultants, external professionals);
- customers and suppliers, commercial or operational, who have relationships with the Group.

All recipients undertake to pursue their objectives with loyalty, seriousness, honesty, competence and transparency, in full compliance with the laws and regulations in force.

4. Principles and rules of conduct

This paragraph of the Code illustrates the rules of conduct and the related principles which must be complied with by all recipients of this document.

I. Staff

Working at Compagnia Tecnica Motori S.p.A. means upholding commitment and loyalty towards colleagues and the Company's collaborators. For this reason, the Company recognizes a high value to the actions and behaviours of its employees and its collaborators, while assuming the task of carrying out all the actions and initiatives required to promote a work environment where these values can be applied in daily activities.

CTM is committed to ensuring fair treatment for all its employees, considering their skills, experiences, abilities, returns and growth potential. The Company values and respects the inclusiveness and uniqueness of each employee, fostering a work environment in which the diversity of personnel is valued and contributes to a harmonious and productive collaboration.

General Principles of Behaviour for staff

All CTM staff members must conform their conduct to the principles expressed in this Code, to current legislation and to the rules of conduct provided for by the reference National Labour Collective Agreement and by the Disciplinary Code in force. It is therefore necessary for every employee and collaborator to work ethically and loyally to achieve business and staff goals.

Responsibilities of managers and staff

Besides complying with the principles established in this Code, the Company Management and Company managers, due to their position, must disseminate this message among their employees.



However, the responsibility of managers does not replace the personal responsibility of employees or the need to use common sense regarding the specific facts of each case. This Code of Ethics and Conduct is a tool to help understand CTM's expectations, to be used in conjunction with company policies to guide and inform the way it conducts its activities.

Recruitment and protection of employees and collaborators

From the recruitment phase, the Company carries out evaluations both on the basis of correspondence between the profiles sought and the applications received, and on the basis of objective data and criteria. CTM therefore adopts measures aimed at eliminating any form of discrimination and favouritism, not admitting any distinction for reasons related to religion, skin colour, political belief, trade union membership, sexual orientation and nationality. The Company undertakes, under any circumstances, not to employ foreign workers without a legal residence permit. Once hired, CTM staff is committed to upholding professional and decent behaviour both in relations with their colleagues and in relations with stakeholders, complying with the content of this Code and protecting the Company's image. To foster the dissemination of corporate culture, the Company provides each employee and collaborator with a copy of this Code of Ethics and Conduct upon the hiring thereof. The same Code of is then saved in the company network and published on the company website.

Protection of the workplace, workers and their obligations

Compagnia Tecnica Motori S.p.A. is responsible for ensuring its employees and collaborators a work environment in accordance with the law and suitable for preventing accidents of any kind, as well as safeguarding their physical and moral wholeness.

The Company must allocate the resources, whether monetary or non-monetary, required to achieve this purpose.

Instead, it is the task of each employee and collaborator:

- to comply with the obligations provided for by law in the field of health and safety;
- to observe the provisions of the employer, managers and supervisors;
- to appropriately use the work equipment and protective devices provided by the Company;
- not to modify the safety devices;
- not to carry out actions that are outside their duties that may endanger both their own safety and that of others;
- to undergo the health checks provided for by current legislation or in any case ordered by the general practitioner;
- to report any risks, including in relation to the health and safety of workers, and situations of non-compliance with the regulations.

Management of conflict of interest



Every employee and collaborator is required to avoid any type of situation or behaviour in which conflicts of interest may arise for the benefit or not of the Company and/or the employee and collaborator themselves.

Therefore, employees and collaborators are not allowed to accept or offer any type of benefit (money, gifts, presents, services, etc.) from third parties that go beyond ordinary courtesy relationships. If an employee and/or collaborator feels to be a situation where a potential risk related to the conflict of interest may arise, the employee must immediately suspend the activity and promptly notify the hierarchical superior thereof. It is the responsibility of the hierarchical superior to report the case to the Company Management for its evaluation.

Protection of corporate resources

Employees and collaborators are required to work with the utmost diligence to protect and enhance the assigned corporate assets, useful for achieving company goals, in compliance with corporate rules. Employees and collaborators always have the obligation to avoid using assigned corporate assets improperly. At the same time, the Company strictly forbids using its systems to access, copy, store or transmit information or content considered offensive, obscene or inappropriate.

Protection of information and privacy

CTM undertakes to ensure that each employee and collaborator treats with absolute confidentiality, even after the termination of the employment relationship, any form of information in their possession. At the same time, CTM recognises the intrinsic value of the personal data of its employees and undertakes to ensure its management, use, storage and disclosure in full compliance with the regulations in force, internal procedures and ethical principles. The Company also undertakes to implement adequate security measures to prevent any form of unauthorised access, unauthorised disclosure, loss or alteration of the aforementioned personal data.

II. Shareholders and members of corporate bodies

The adoption of good corporate governance practices is of vital importance for Compagnia Tecnica Motori S.p.A., as it allows it to protect its value and the Company's reputation in the long term. All Shareholders and members of all corporate bodies, depending on their position, are required to comply with the contents of this Code of Ethics and Conduct, even if they are not employees of the Company, in carrying out their activities.

Likewise, they must maintain responsible behaviour towards the Company, its employees and its collaborators that is substantiated through the implementation of prudent, non-speculative policies aimed at safeguarding the company's strength, refraining from taking actions in the presence of a conflict of interest.

Protection of transparency in intra-group transactions



Intra-group transactions, including transactions with related parties, must be carried out in a transparent manner and in compliance with market conditions.

Protection of information

All members of the corporate bodies must use the information they may encounter in line with their duties confidentially. This obligation is imposed to ensure the protection and security of the company's sensitive information and to avoid any possible damage resulting from improper disclosure of such information.

III. Customer relations

Meeting the needs of its customers is one of the key goals for the activity of Compagnia Tecnica Motori S.p.A.

Promoting the quality and safety of products and services

The Company greatly focuses on the level of quality of its products and the services it offers, ensuring compliance with the highest industry standards. To this end, CTM invests resources both in the training of its personnel and in the improvement of processes to maintain the high standards of its products and services and to guarantee their reliability at the same time. In this sense, CTM was awarded ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 certificates.

Fairness in business relations

CTM is committed to maintaining business relations with its customers in full compliance with the principles of transparency, integrity, honesty and good faith, avoiding the use of any deceptive practice. This translates into ensuring that business negotiations are conducted in a correct and clear manner, with a transparent assumption of contractual obligations and a diligent fulfilment of the same, thus guaranteeing a trusting and collaborative relationship with its customers.

The Company strictly prohibits its employees and collaborators from offering and/or receiving to/from customers gifts and benefits of all kinds such to create grounds for illegal conduct, even partial, which may be aimed at achieving an advantage or personal interest. The employee or collaborator who receives gifts or favourable treatments that go beyond ordinary courtesy relationships must immediately notify his/her superior and/or the Company Management.

Confidentiality of information

CTM is committed to conducting its business with integrity and protecting the confidential information of its customers. The Company and all its staff handle customer information confidentially and cautiously and undertake not to disclose it without approval.



Communication of ethical principles

CTM undertakes to communicate to all its customers the ethical principles enshrined in this Code, including through its order confirmations (where possible). This practice enables to ensure a clear and direct transmission of corporate values, therefore promoting an ethical conduct not only within the company but also in interactions with the customers and the involved external stakeholders .

IV. Supplier relations

Compagnia Tecnica Motori S.p.A. maintains business relations with its suppliers aimed at upholding the utmost correctness, transparency, integrity, honesty and good faith. This category also includes persons acting in the name and/or on behalf of the Company.

CTM requires all its suppliers to comply with the principles and values set out in this Code of Ethics and Conduct and all applicable international, national laws, regulations and standards, including those relating to illegal employment, slavery and human trafficking and environmental protection. The Company also undertakes to establish relationships that are beneficial to all parties involved, concluding fair and correct transactions with business partners and suppliers.

CTM is committed to ensuring that every business interaction is characterised by fairness and professionalism. Therefore, all employees and senior managers are encouraged to:

- create a fair negotiating environment under all circumstances;
- establish and regulate relations with third parties through clear and transparent contracts.

Protection of transparency in the supplier vetting process

The Company communicates to its suppliers the content of this document, where possible, before undertaking any business relationship or in any case in the order confirmations issued.

CTM adopts an impartial policy in the vetting of suppliers and their offers, based on objective criteria and the principles of fairness, quality, economy, loyalty and ethics.

Fairness in business relations

CTM maintains business relations with its suppliers in compliance with the utmost fairness, transparency, integrity, honesty and good faith, avoiding the use of any deceptive practices.

The Company strictly prohibits its employees and collaborators from offering and/or receiving to/from its suppliers gifts and benefits of all kinds such to create grounds for illegal conduct, even partial, which may be aimed at achieving an advantage or personal interest. The employee or collaborator who receives gifts or favourable treatments that go beyond ordinary courtesy relationships must immediately notify his/her superior and/or the Company Management.

Slavery and human trafficking

CTM is against any form of child labour and any activity that encourages the trafficking of children, individuals and groups of people. CTM also does not allow any form of exploitation. All providers must



not engage in activities or initiatives that inhibit the growth of children and the employment of persons under the age of compulsory education.

Diversity, inclusion and collective bargaining

CTM does not tolerate acts of bullying, harassment or discrimination of any kind against staff, including any form of physical, verbal or psychological abuse related to religion, skin colour, political belief, trade union membership, sexual orientation and nationality, promoting an environment free from any kind of discrimination, equal opportunities, gender diversity and respect for its employees, free to join any type of trade union.

Corruption, conflict of interest and free competition

CTM conducts its business in compliance with Competition authority laws, respecting its competitors and avoiding any conflict of interest and behaviour that may harm free competition. CTM employees must not engage in activities that could lead to non-competitive behaviour such as disseminating confidential corporate information. Contacts with competitors are only allowed in the event of proven reasons recognised as such by independent third parties and must in any case be limited to supporting a lawful and correct business purpose.

The Company undertakes to disseminate the principles aimed at combating corruption to its entire organisation and its suppliers. CTM also urges its suppliers to behave ethically in all dealings with public authorities and their representatives.

CTM respects competition law (prohibition of collusion and abuse of dominant position, and all other practices contrary to competition law). In particular, employees and senior managers must refrain from any behaviour aimed at or having the effect of preventing, restricting or distorting competition in the markets.

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Import and export laws

CTM undertakes to comply with the laws relating to imports and exports and the regulations and procedures applicable to its business. CTM requires that its suppliers, in carrying out their activities, operate in compliance with all laws relating to import and export and that they obtain all necessary permits and authorisations.

Quality and continuous improvement

CTM places quality at the centre of its activity, constantly striving to improve its processes; for this to happen, the Company requires that all its suppliers demonstrate a priority commitment to putting the principle of quality at the centre of their activities, equipping themselves, where possible, with management systems that comply with the requirements of the ISO 9001 standard.

The Company actively encourages suppliers to pursue continuous improvement of their processes, in order to ensure increasingly high standards of quality and customer satisfaction.



Protection of the health and safety of suppliers

CTM is firmly committed to ensuring the protection and supervision of the health and safety of its suppliers' workers who carry out activities at its premises. This commitment translates into constant focus to the workplace safety and wellbeing of workers, so that all relevant regulations and safety procedures are implemented and complied with.

Confidentiality of information

CTM is committed to acting with integrity to protect the confidential information of its suppliers. The Company and all its personnel handle the confidential information of its suppliers with the utmost confidentiality and caution, prohibiting any form of disclosure, unless previously approved.

The Company requires that all its suppliers protect and safeguard CTM's proprietary information, in compliance with current regulations.

V. Relations with the Public Administration

Within the scope of this Code of Ethics and Conduct, the definition of Public Administration includes all public bodies, public service concessionary bodies, natural or legal persons acting as a public official, a public service officer, a member or official belonging to a Body of the European Community, a foreign State official, the judiciary, public supervisory authorities.

Fairness in relations with the Public Administration

Relations with the Public Administration must always be maintained in a transparent and correct manner. Employees of the Company, collaborators or persons in charge of having any type of relationship with the Public Administration, must avoid any kind of behaviour that seeks to influence its decisions, or that can be interpreted as such. It is also forbidden to make false statements, omit information and accept or offer any type of benefit.

Correctness in the use of Public Administration computer systems

It is forbidden to manipulate the information contained within a Public Administration computer system with the sole purpose of obtaining an advantage, even of a non-economic nature. Such actions undermine the principles of fairness, transparency and accountability essential to the proper functioning of government operations.

Protection in the management of contributions, subsidies and loans disbursed by the Public Administration

Compagnia Tecnica Motori S.p.A. explicitly prohibits the use of contributions, subsidies or loans disbursed by the Public Administration for purposes other than those for which they were obtained. This prohibition is essential to ensure the correct allocation of public resources and to ensure transparency and accountability in the use of government funding.

Selection of employees with relations with the Public Administration



The management of the process of vetting and hiring a public employee, former employee or person who has had any type of relationship with the Company and/or relatives of employees, must comply with the rules and regulations in force and is subject to painstaking evaluation by the Company Management.

Gifts & benefits

The Company absolutely prohibits its employees and collaborators from offering and/or receiving from the Public Administration gifts and benefits of all kinds such as to result in illegal conduct, even partial, which may be aimed at achieving an advantage or a personal or business interest. Acts of commercial courtesy, such as gifts and forms of hospitality, are permitted as long as they are previously and duly authorized by the Company Management, if and when they are of modest value and in any case such as not to compromise the integrity or reputation of one of the parties. The employee or collaborator who receives gifts or favourable treatments that go beyond ordinary courtesy relationships must immediately notify his/her superior and/or the Company Management.

VI. Lenders

In response to the requests of its lenders, CTM ensures that the information and data requested represent the true statement of assets and liabilities, economic and financial position of the Company. Furthermore, CTM undertakes to promptly comply with the deadlines agree with its lenders, so as to establish a relationship based of transparency and fairness.

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VII. Anti-Money Laundering

Money laundering is the process by which natural or legal persons conceal illicit funds or make them appear lawful. Money laundering is a serious crime governed by international conventions and national criminal codes. Currently, monetary transactions, including bank transfers and currency exchanges are constantly monitored by national and international authorities.

CTM will not tolerate, encourage or support money laundering. Employees are required to pay attention to irregularities in payment methods and to be extremely cautious in collaborating with business partners who appear to lack in integrity.

Examples of transactions that may be irregular include the following:

- payments made in currencies other than those specified in the invoice
- payments made to or received from countries unrelated to the transaction
- attempts to make payments in cash or by means equivalent to money
- payments made by third parties not linked to the contract or from a current account other than the one normally used by the counterparty
- requests or attempts to make payments for each invoice or group of invoices through different forms of payment, and
- requests to make overpayments.



Employees are required to report to Company Management all suspicious behaviour or requests within the scope of CTM's business which expects employees to always use a prudential approach during contacts with business partners to prevent and detect illegal financial transactions.

VIII. Environmental protection

CTM carries out its activities with scrupulous respect for the environment and compliance with the environmental regulations in force. In order to achieve this objective, the Company takes all necessary measures to preserve the ecosystem, with particular attention to the proper disposal of waste and the protection of water, soil, subsoil and the atmosphere. CTM is actively committed to providing its employees and collaborators with continuous training in environmental protection. This training aims to raise staff's awareness of the potential environmental impacts deriving from company activities, in order to promote responsible and sustainable behaviour.

Compagnia Tecnica Motori S.p.A. was awarded the ISO 14001: 2015 certificate in 2008, confirming its official commitment to environmental management in accordance with recognised international standards.

5. Whistleblowing and reports management

Any breach of the Company Code must be promptly reported. Therefore, in compliance with the provisions of the Legislative Decree 24/2023, Compagnia Tecnica Motori S.p.A. established an internal communication channel(<https://ctm.wb.teseoerm.com/#/>) with the purpose of reporting actual or suspected breaches, ensuring that whistleblowers do not suffer retaliation and that the maximum protections are ensured for them. In handling reports, the personal data of the whistleblower and any other parties involved will be processed in full compliance with current legislation on the protection of personal data, including EU Regulation 679/2016 ("GDPR") and Legislative Decree 196/2003.

Compagnia Tecnica Motori S.p.A. guarantees:

- the protection of the confidentiality of the identity of the whistleblower and the alleged perpetrator of the breaches, without prejudice to the rules governing investigations and proceedings initiated by the judicial authority in relation to the facts covered by the reports;
- the protection of the reporting party against retaliatory, discriminatory or unfair conduct resulting from the reporting;
- an anonymous and protected reporting channel.

The legislation protects anyone who has professional relations with the company and includes:

- all employees (subordinate staff);
- persons with administrative, management, control, supervisory or representative functions;
- self-employed workers who carry out their activity at the Company;
- volunteers and trainees (paid or unpaid) who work for the Company;



- freelancers and consultants who work for the Company;
- business and/or operational partners of the Company who have a role in the operations and/or projects of the Company.

I. Protection from retaliation

CTM considers the psycho-physical well-being of its employees and collaborators to be of primary importance and is firmly committed to protecting those who lodge reports in good faith. In accordance with legal obligations, the Company implemented an anti-retaliation policy; with these protection measures, CTM aims to promote a safe and welcoming environment for those who choose to report breaches or unlawful conduct. The goal is to create a corporate culture based on integrity, transparency and mutual respect, where employees feel free to express concerns without fear of retaliation or discrimination. The Company seeks to encourage the collaboration and active participation of all personnel in promoting ethical and law-abiding business practices.

Retaliation will not be tolerated, including the following scenarios:

- dismissal, suspension or equivalent measures;
- demotion or non-promotion;
- change of functions, change of workplace, reduction of salary, change of working hours;
- suspension of training or any restriction of access to the same;
- demerit notes or negative references;
- adoption of disciplinary measures or other penalties, including financial penalties;
- coercion, intimidation, harassment or ostracism;
- discrimination or unfavourable treatment;
- failure to convert a permanent employment contract, where the worker had a legitimate expectation of such conversion;
- non-renewal or early termination of a fixed-term employment contract;
- damage, including to the person's reputation, in particular on social media, or economic or financial prejudice. Including loss of economic opportunities and loss of income;
- listing improperly on the basis of a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find employment in the sector or industry in the future;
- early termination or cancellation of the contract for the supply of goods or services;
- cancellation of a license or permit;
- request to undergo psychiatric or medical investigations.

II. Disciplinary penalties

The protection of the whistleblower is not guaranteed in the event that the criminal liability of the whistleblower for the crimes of calumny and defamation, or his civil liability for the same complaint in cases of wilful misconduct or gross negligence, has been ascertained by first instance judgment. In



case of ascertainment of responsibility, CTM will act promptly for the application of disciplinary penalties to the reporting person or whistleblower. Therefore, the Company reserves the right to take appropriate measures to protect its reputation and its legal interests in the event of groundless or harmful complaints.

6. Compliance with the Code and penalty system

Compliance with and dissemination of the principles and values set out in this Code of Ethics and Conduct are the fundamental pillar for carrying out the Company activities. The recipients of this Code are required to comply with the principles contained therein and to promote compliance therewith. Any breach of this Code creates grounds for corrective action and disciplinary action by the Company. Employees are encouraged to act promptly by reporting any actual or alleged breaches of the Code to their manager or Company Management.

The Board of Directors of the Company plays a critical role in the dissemination and application of this Code of Ethics and Conduct, including the imposition of penalties in accordance with the disciplinary system provided for by the National Collective Labour Agreement (CCNL) of the relevant industry and by the contracts stipulated with the stakeholders. The Board also undertakes to promote an ethical culture within the organisation and to ensure that ethical principles are complied with in all areas of business activity.

The Code of Ethics and Conduct is an integral, substantial and essential part of the contractual obligations of subjects who have relations with the Company; therefore, were collaborators, consultants, suppliers, customers or other third parties connected to the Company by a non-employee contractual relationship to breach the provisions of this Code, the contractual remedies provided for by law and any other action provided for by the regulations in force to protect the integrity of the Company will be applied.

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7. Amendments and updates to the Code of Ethics and Conduct

Any substantial amendments and/or updates to the Code of Ethics and Conduct must be submitted to the approval of the Company's Board of Directors. The Board of Directors will endeavour to ensure that such amendments or updates are disseminated in a timely manner to all recipients of the document. This practice ensures that all employees and collaborators are constantly informed about the rules and ethical principles in force within the company, thus promoting a corporate culture based on integrity and transparency.