

CORPORATE CODE OF ETHICS ***of Eurosyn S.p.A.***

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Enrico Maria Campana (CEO)



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1 - General Principles

1.1 Introduction

Considering the sector in which EUROSYN S.p.A. (hereinafter referred to as “Eurosyn”, the “Company” or the “Organization”) operates, it is essential to clearly define the set of values that it recognizes, shares, and promotes, in the awareness that conduct inspired by the principles of diligence, fairness, loyalty, integrity, and professionalism represents a fundamental factor for the quality of the services provided and for the sustainable development of the Organization.

This Code of Ethics forms an integral part of the Management System adopted by Eurosyn and represents a behavioral guideline aimed at ensuring consistency, reliability, transparency, and accountability in the performance of corporate activities.

This Code of Ethics defines the general principles of conduct that apply, without exception, to members of corporate bodies, employees, collaborators, and all those who operate directly or indirectly in pursuit of the Company's objectives.

Compliance with ethical principles directly contributes to the quality of processes, the conformity of the services provided, customer satisfaction, and the protection of the Company's image and reliability.

The ethical culture of the Organization is based on the sharing of the principles set out in this Code and on the consistency of conduct at all levels.

Eurosyn recognizes the professional contribution of the people who work within it as an essential factor for business success and promotes respect for personal dignity, fundamental rights, impartial treatment, and equal opportunities.

Therefore, any form of discrimination or physical and psychological harassment is avoided, and in particular any discrimination based on gender, race, nationality, sex, age, physical disability, sexual orientation, political or trade union opinions, or religious beliefs.

Within the scope of the responsibilities associated with their role, everyone is required to act with the highest level of professionalism and commitment, making a concrete contribution to the achievement of the Company's objectives.

1.2 Ethical Principles

In carrying out its activities, Eurosyn:

- operates in compliance with applicable laws and regulations, company procedures, and the principles of the Management System;
- recognizes ethical conduct as a fundamental element in ensuring the quality of processes, services, and relationships with stakeholders;
- considers unethical behavior to be a risk to the quality of processes, the trust of stakeholders, and the reputation of the Organization;
- promotes fairness, transparency, integrity, and accountability in internal and external relations;
- safeguards the confidentiality of information and the reliability of communications;
- values human resources, as well as the safety and well-being of workers;
- adopts an approach focused on risk prevention and the continuous improvement of its organizational and ethical performance;

- ensures the confidentiality of the information in its possession and refrains from seeking or processing confidential data, except where there is explicit and informed authorization and/or compliance with applicable legal provisions;
- plans its activities by seeking the best possible balance between economic initiatives and environmental needs, taking into account the rights of present and future generations;
- relies on the high quality of the products handled and the services provided, as well as on the competence and commitment of its collaborators, recognizing the value of free, open, and fair competition and refraining from unlawful agreements, abusive conduct, and the abuse of any dominant position;
- attaches great importance to the physical and moral integrity of its collaborators, to working conditions that respect individual dignity, and to safe and healthy working environments;
- condemns child labor and does not tolerate requests or threats aimed at inducing individuals to act against the law, this Code of Ethics, or their individual moral convictions or personal preferences;
- safeguards and promotes the value of human resources with the aim of improving and developing their skills and competencies;
- in carrying out its activities, acts in compliance with the laws and all applicable regulations in the countries in which it operates, as well as with this Code of Ethics and its Policy Document, applying them with integrity and fairness.

2 - External Relations

2.1 General Provisions

Members of corporate bodies, employees, and collaborators of Eurosyn must conduct themselves with the utmost fairness and integrity in all dealings with individuals and entities external to the Company.

Gifts that could be interpreted, even indirectly, as exceeding the normal courtesies accepted in commercial practice are not permitted. Only gifts or tokens of negligible value are allowed, provided they are not intended to obtain, even indirectly, favorable treatment.

Any donations to organizations must also not be used as a means to gain preferential treatment.

When initiating commercial relationships with new suppliers and clients, and in managing existing ones, it is necessary to avoid, based on publicly available information and/or information required by applicable laws:

- engaging with parties involved in illegal activities, particularly related to arms and drug trafficking, money laundering, terrorism, or, in any case, with parties lacking the necessary standards of seriousness and commercial reliability;
- maintaining financial or commercial relationships with parties who, even indirectly, hinder human development or contribute to the violation of fundamental human rights;
- engaging in behavior that is discriminatory toward personal dignity, privacy, or individual rights, based on race, nationality, social conditions, political or trade union opinions, religious beliefs, sexual orientation, health status, or any other intimate personal characteristic;
- using incentives or disincentives that encourage foreign industrial investments based on the exploitation of child labor, instead establishing codes of conduct for sectors and companies that internationalize their activities.

2.2 Relations with Third Parties

Professionalism, competence, fairness, and courtesy represent the guiding principles in relations with third parties. Eurosyn makes its Code of Ethics available through corporate communication channels, including its website, and promotes its awareness among suppliers, consultants, clients, and, more generally, all stakeholders.

Eurosyn expects that parties who engage with the Company share and respect the principles of legality, fairness, transparency, and respect for individuals as set out in this Code in the performance of their activities.

Relations with third parties must be conducted with professionalism, fairness, transparency, and compliance with the law, with particular reference to provisions regarding offenses against Public Administration, and must be managed in full independence from any form of internal or external influence.

Relations with Suppliers, Consultants, and Banks

Individuals responsible for the acquisition of goods and/or services:

- are required to uphold the principles of impartiality and independence in the performance of their assigned tasks and functions;
- must remain free from personal obligations toward suppliers and consultants;
- must maintain relationships and conduct negotiations in a manner that establishes a solid foundation for mutually beneficial and long-lasting relationships, in the interest of Eurosyn;
- are strictly required to immediately report to Management any attempt or instance of unjustified alteration of normal commercial relations;
- must not accept goods or services from internal or external parties in exchange for obtaining confidential information or initiating actions or behaviors intended to favor such parties, even if no direct repercussions for the Company occur

Selection Criteria

The purchasing process must reconcile the pursuit of the maximum competitive advantage for Eurosyn with fairness and impartiality. In particular, those who, on behalf of Eurosyn, oversee this process must operate in a way that:

- allows anyone meeting the objective requirements established by company regulations to compete fairly;
- creates adequate conditions for competition.

Eurosyn also maintains collaborative relationships with scientific institutions and professionals. In these relationships, the only selection criteria are related to quality and scientific competence.

For specific types of goods or services, in addition to the standard selection criteria, the following must also be considered:

- the declared and documented availability of resources, including financial means, organizational structures, project capacity, know-how, etc.;
- the actual existence of adequate corporate quality systems;
- the supplier's ability, in cases where the supply includes know-how or third-party rights, to generate added value.

Relations with Clients

Eurosyn directs its relations with clients according to the principles of fairness, transparency, and reliability.

The quality of the information provided, the clarity of communications, and adherence to commitments represent essential elements of ethical conduct and are key factors in ensuring client satisfaction.

Any behavior that could compromise client trust or the reliability of the service is considered contrary to the principles of this Code of Ethics.

Individuals responsible for the sales process and, therefore, for maintaining commercial relationships with clients:

- must remain free from personal obligations toward clients;
- must maintain relationships and conduct negotiations in a fair and transparent manner, creating a solid foundation for mutually beneficial and long-lasting relationships, in the interest of Eurosyn;
- must engage in responsible marketing and strictly respect privacy;
- must act in compliance with laws regulating commercial activities, as well as those governing competition;
- are strictly required to immediately report to Management any attempt or instance of unjustified alteration of normal commercial relations;
- must not accept goods or services from internal or external parties in exchange for obtaining confidential information or initiating actions or behaviors intended to favor such parties, even if no direct repercussions occur for the Company.

Relations with Public Administration

For the purposes of this Code of Ethics, the term Public Administration shall include, in addition to any public entity or publicly-owned company, any independent administrative agency, individual or legal entity acting as a public official or as a person in charge of a public service, as well as members or officials of the European Communities or officials of foreign States.

Also for the purposes of this Code of Ethics, the definition of Public Entity includes private parties who, for overriding political or economic reasons, perform a public function aimed at safeguarding general interests.

In dealings with the Public Administration, Eurosyn employees and collaborators are not permitted, either directly, indirectly, or through intermediaries, to offer or promise money, gifts, or any form of compensation, nor to exert unlawful pressure, nor to promise any object, service, or benefit in favor of executives, officials, or employees of the Public Administration, or persons in charge of a public service and their relatives or cohabitants, with the purpose of inducing them to perform acts either in compliance with or contrary to the duties of the Public Administration.

Only gifts of negligible value are allowed, provided they are not intended to induce the aforementioned persons to act contrary to the duties of office.

Anyone receiving explicit or implicit requests for benefits of any kind from Public Administration representatives, as defined above, must promptly inform Management so that appropriate actions can be taken.

The provisions indicated above must not be circumvented through other forms of aid or contributions that, under the guise of assignments, consulting, advertising, or otherwise, have objectives similar to those prohibited in this paragraph.

In particular, the following actions must not be undertaken, either directly or indirectly:

- offering or proposing employment or commercial opportunities that could personally benefit Public Administration employees;
- soliciting or obtaining confidential information that could compromise the integrity and/or reputation of either party.

Relations with Judicial Authorities

With regard to any requests of any kind from Judicial Authorities, and in general in all contacts with them, Eurosyn undertakes to provide full cooperation, to make truthful and accurate statements, and to refrain from any conduct that could obstruct justice, in full compliance with the law and in accordance with the principles of loyalty, fairness, and transparency.

Furthermore, all recipients involved in judicial proceedings are required to actively cooperate and provide truthful, transparent, and factually accurate statements.

It is explicitly prohibited to:

- engage in any activity that could favor or harm any of the parties involved during the proceedings;
- in any way or by any means, influence the will of individuals called upon to respond to Judicial Authorities in order to prevent them from providing statements or to induce them to declare false facts;
- promise or offer money, gifts, or other benefits to individuals involved in judicial proceedings or to persons closely associated with them.

Relations with Entities and Associations

Eurosyn may consider requests for contributions from non-profit entities and associations with proper statutes and founding documents, for activities related to social, sports, environmental, cultural, and scientific matters.

In any case, when selecting proposals to support, Eurosyn is careful to prevent and avoid any potential conflict of interest, whether personal or corporate.

2.3 Management of Financial Resources

The management of financial resources must be carried out in strict compliance with the delegations granted to each individual, as well as any specific authorizations required for the execution of particular transactions or specific categories of transactions.

Recording and Use of Accounting Information

Accounting transparency is based on the existence, accuracy, and completeness of the underlying information for the relevant accounting records. Each director, employee, collaborator, and service provider is required to ensure that management events are correctly and promptly recorded in the accounts.

Each entry must accurately reflect the supporting documentation. It is the responsibility of every individual involved to ensure that documentation is easily retrievable and organized according to logical criteria. All individuals are required to promptly inform their superiors of any omissions, falsifications, or negligence in the accounting records or in the documentation supporting such entries, using appropriate communication channels.

2.4 Information Management

Eurosyn ensures full transparency, completeness, and traceability in the preparation of communications, statements, and notices addressed to Public Authorities, suppliers, consultants, clients, and its own employees and collaborators.

Each transaction must be properly documented to allow, at any time, controls that make it possible to:

- verify its characteristics and rationale;
- identify the individuals who authorized, executed, recorded, and verified the transaction.

Eurosyn ensures the confidentiality of the information in its possession and compliance with data protection regulations. In accordance with EU Regulation 2016/679 (GDPR), the Company undertakes to guarantee respect for privacy, particularly regarding information relating to the private sphere and opinions of its employees and, more generally, all those who interact with the Company.

Recipients are required to respect and protect information relating to Eurosyn's activities acquired and/or processed in the course of performing their duties or functions, and to use such information properly in the interest of the Company, safeguarding its confidentiality and privacy.

2.5 Conflicts of Interest

Employees, managers, members of corporate bodies, and, in general, all those acting in the name and on behalf of Eurosyn must avoid any situation that could give rise to a conflict of interest arising from the following activities:

- participating in decisions involving transactions with parties with whom a conflict of interest exists;
- participating in decisions involving transactions from which a personal interest could arise;
- proposing or accepting agreements, or, in general, engaging in any conduct that could, directly or indirectly, cause harm to Eurosyn, including reputational or market credibility damage;
- influencing the decision-making autonomy of another individual responsible for managing commercial relationships with or on behalf of the Company.

Employees who find themselves in a situation of conflict of interest, even if only potential, must immediately notify Management.

In conducting any activity, Eurosyn must avoid situations where the parties involved in transactions are in a conflict of interest.

Examples of Expected Behavior

- Do not accept or offer any gifts or hospitality if this could compromise our independence, influence our decision-making, serve as a reward favoring the interests of a third party, or otherwise be considered inappropriate.
- Offering or accepting gifts and services may only occur in accordance with established guidelines.
- Report to the Company any potential conflict of interest that could influence one's conduct.
- Do not exploit one's position within Eurosyn for personal gain or to benefit relatives or collaborators.
- Report to the Company and refrain from participating in any hiring or decision-making processes involving individuals with whom there is a personal or family relationship.

2.6 Anti-Money Laundering

Eurosyn conducts its activities in full compliance with current anti-money laundering regulations and the provisions issued by the competent authorities.

To this end, Eurosyn undertakes to avoid engaging in transactions that may be considered suspicious in terms of fairness and transparency. In particular, all employees are committed to verifying, in advance, the available information concerning clients, suppliers, and external collaborators in order to assess their respectability and the legitimacy of their activities, promptly informing Management of any anomalies detected.

Employees are also required to act in a manner that avoids involvement in transactions that could potentially facilitate the laundering of money derived from illegal or criminal activities, acting in full compliance with anti-money laundering regulations.

3 - Internal Relations

3.1 Employee Code of Conduct

Individual behavior, adherence to rules, and attention to the quality of one's work directly contribute to the effectiveness of company processes and the reliability of services provided.

Employees, managers, and collaborators of Eurosyn are required to adopt conduct consistent with the principles of this Code of Ethics. In particular, they must:

- commit to developing their skills and professionalism, enriching them through experience and collaboration with colleagues, adopting a constructive and proactive attitude, and fostering the professional growth of their collaborators;
- base their decisions on principles of sound and prudent management, carefully assessing potential risks, with the awareness that personal choices contribute to achieving positive corporate results;
- protect and maintain the confidentiality of information acquired in the course of their assigned activities. Such information may not be used, communicated, or disclosed either internally or externally, except as required by applicable law and regulated by company procedures;
- respect and safeguard company property and prevent its fraudulent or improper use;
- use company tools in a manner functional and exclusive to the performance of work activities or for purposes authorized by the relevant internal functions;
- ensure that personal financial situations do not affect the proper performance of their work activities;
- avoid soliciting or accepting, for themselves or others, recommendations, preferential treatment, gifts, or other benefits from parties with whom they interact.

With specific reference to the use of Information Systems, it is explicitly prohibited to use them for purposes contrary to legal provisions, public order, or good conduct, or for activities promoting racial intolerance, glorifying violence, violating human rights, committing or inducing criminal acts, damaging or altering information systems or the information of third parties (public or private), or unlawfully obtaining confidential information.

The illegal downloading or transmission of copyrighted content to third parties is also prohibited.

If non-symbolic gifts or acts of hospitality are received, the direct supervisor, and possibly Management, must be informed to assess the potential return of the gift or any other appropriate action.

Examples of Expected Behavior

- Become familiar with and apply internal rules governing the use of social networks.
- Before sending an email or posting on social networks, consider whether it could be perceived as inappropriate or unethical. If the answer is yes, do not send the email or make the post.
- Use IT tools appropriately, ensuring they are not damaged and are used exclusively for work purposes.
- Comply with applicable data privacy legislation and related laws.
- Once a contractual relationship with Eurosyn has begun, do not share confidential information that belongs to previous companies in violation of applicable laws or contractual clauses.
- Correctly handle and protect confidential information.

- Do not share information with third parties without a confidentiality agreement.

3.2 Protection of the Individual

The Company is committed to safeguarding its personnel, ensuring the inherent right to working conditions that respect personal dignity, and, to this end, opposes any discriminatory behavior or conduct that could in any way harm the individual.

Eurosyn promotes a collaborative work environment fully aligned with the principles of Respect for Diversity.

3.3 Prevention of Harassment and Gender-Based Violence

With the aim of ensuring a harmonious work environment based on respect for individual freedom and dignity, Eurosyn considers the prevention of sexual harassment to be fundamental. Sexual harassment is defined as any act, behavior, whether physical, verbal, or non-verbal, with a sexual connotation or based on sex, that may in any way offend or harm the freedom, dignity, or inviolability of the person to whom it is directed.

The Company also disapproves of any form of harassment, violence, or discriminatory behavior, including on the basis of gender, that could in any way affect hiring, remuneration, access to training, promotions, job retention, or create a hostile work environment.

3.4 Human Resources Management

The Company is committed to developing the skills and abilities of each employee so that the energy and creativity of individuals can be fully expressed, allowing each person's potential to be realized. Eurosyn is dedicated to providing equal employment opportunities for all employees, based on professional qualifications and performance capabilities, without any form of discrimination.

Eurosyn selects, hires, compensates, and manages employees according to merit and competence, without discrimination on the basis of political affiliation, union membership, religion, race, language, gender, or sex, in compliance with all applicable laws, regulations, and directives. Furthermore, the competent functions are committed to creating a work environment free from prejudice and intimidation, where every individual is treated as a colleague and a member of the team, respecting their professionalism and avoiding unlawful pressures or undue discomfort.

Each employee shares the responsibility of helping to foster a professional climate in which all colleagues feel welcomed and encouraged to achieve their objectives.

Examples of Expected Behavior

- Treat colleagues, supervisors, and collaborators fairly and respectfully.
- Promote a positive work environment, free from discrimination and harassment.
- Avoid discrimination in recruitment, training, promotions, and any other employment-related decisions.
- Take advantage of training provided by the Company and apply it to one's work.
- Commit to professional growth by updating knowledge and skills.
- Offer and request information that contributes to one's own learning and that of colleagues.

- Promote constructive dialogue regarding colleagues' performance to support their professional development.
- Share knowledge and resources with colleagues to help the team achieve its objectives.
- Work efficiently, making good use of time and resources, and strive to deliver the maximum value to the Company.

3.5 Management of Confidential Information

One of Eurosyn's most valuable assets is the information it has accumulated during its activities. Each employee is responsible for the integrity and protection of the Company's confidential information and intellectual property, and it is their duty to take all reasonable precautions to prevent improper disclosure.

Intellectual property includes inventions, improvements, ideas, information, software, designs and programs, related documentation, patents, trademarks, and copyrights. The Company exclusively owns all intellectual property that arises from its activities or is developed by employees and collaborators using the spaces and tools provided by the Company.

Employees must also ensure that they do not misuse the intellectual property or confidential information of any other parties. Each employee must have a working knowledge of the laws and regulations related to their job responsibilities.

Eurosyn's intellectual property is extremely valuable, yet simultaneously fragile, because it can be compromised or rendered ineffective if it is not protected by everyone.

3.6 Management of Electronic Media

All electronic and telephone communications, computer equipment, software, services, and all information transmitted or stored on these systems are the property of Eurosyn and, as such, are reserved exclusively for official activities.

All messages and information sent, received, or stored using the email system and instant messaging tools are and will remain the property of the Company, including user accounts. Unless expressly required by law, no electronic communication should be considered private property of an employee, and employees should have no expectation of privacy for messages or communications transmitted using Eurosyn's electronic resources.

Cybersecurity and risk management are critical responsibilities for everyone, and similarly, risk mitigation is everyone's duty. Employees are responsible for the content on computers and other mobile storage devices and may be held accountable for any violations of company policies.

All employees must use the Company's electronic resources responsibly, efficiently, and appropriately, and must protect them from any misuse that could harm the Company's interests or reputation

3.7 Compliance with Laws

Compliance with laws and internal rules is an essential requirement. Failure to adhere to regulatory, procedural, or ethical provisions is considered a risk factor for the Management System and for the achievement of the Company's objectives.

Examples of Expected Behavior

- Comply with applicable laws and refrain from actions that could distort competition.
- Do not exchange confidential information with competitors, nor engage in discussions that could lead to anti-competitive behavior.
- Do not enter into agreements with competitors involving prohibited practices, including, but not limited to, price-fixing, market allocation, or customer allocation.
- Comply with laws and regulations applicable to the recording of information.
- Ensure that all information, financial and otherwise, is accurate and reliable.
- Do not make false statements regarding income or expense reimbursements.
- When dealing with public authorities, ensure that all information provided and communications made are truthful and reliable.

4 - Environment and Safety

Eurosyn is committed to promoting and consolidating a culture of safety by raising risk awareness, encouraging responsible behavior from all collaborators, and acting to preserve, especially through preventive measures, the Health and Safety of workers.

Eurosyn's activities must be carried out in full compliance with current prevention and protection regulations. Operational management must follow advanced criteria for environmental protection and energy efficiency, pursuing the improvement of Health and Safety conditions in the workplace.

Eurosyn is also committed to ensuring the protection of working conditions regarding the psycho-physical integrity of employees, respecting their moral personality and preventing unlawful pressures or undue discomfort.

Eurosyn manages its activities with the goal of safeguarding the environment and the safety of its personnel and third parties, aiming for continuous improvement in performance in these areas.

To this end, Eurosyn:

- Commits to complying with applicable safety and environmental regulations;
- Develops and communicates procedures regarding environmental protection and safety that must be followed by employees;
- Promotes employee participation in risk prevention, environmental protection, and the safeguarding of Health and Safety for themselves, colleagues, and third parties;
- Prohibits working under the influence of alcoholic substances, narcotics, or similar substances, and forbids consuming or distributing narcotics during working hours;
- Prohibits smoking in all work environments and areas, except in specifically designated zones outside the company perimeter, to prevent risks to people, equipment, and materials. Non-compliance with this prohibition is subject to disciplinary measures in accordance with law and contractual provisions.

Examples of Expected Behavior

- Learn and understand the rules, obligations, and internal processes of the Environmental Management System applicable to one's activities.
- Minimize the environmental impact of one's activities by reducing the consumption of natural resources (energy, water, paper, and others).
- Take an active role in energy-saving and waste-reduction programs.

- Encourage environmental awareness in one's work.
- Report any injury, accident, or near-miss that could pose a threat to the environment.
- Know and comply with the Company's Health and Safety regulations in daily work activities.
- When required, use the prescribed personal protective equipment and adopt defined preventive measures.
- In case of risks arising from hazardous behavior or specific situations related to one's work, correct them or immediately notify the responsible party so that corrective action can be taken.
- Immediately report any injury, accident, near-miss, or other situation that could pose a threat to the Health or Safety of the Company, employees, or the organization as a whole.

5 - Implementation Methods

5.1 Disciplinary System

The principles expressed in this Code of Ethics are an integral part of the terms governing the employment relationship at Eurosyn. Any violations will result in the application of sanctions in accordance with the current disciplinary system established for employees, managers, directors, and statutory auditors, proportionate to the severity of the violation.

Eurosyn, through specifically designated Bodies and Functions, applies sanctions consistently, impartially, and uniformly, proportionate to the aforementioned violations, in compliance with current regulations regarding the governance of employment relationships (National Collective Labor Agreement for Commerce).

The Company contractually requires its suppliers, consultants, and collaborators to comply with the law and to acknowledge and adhere to the principles set forth in this Code of Ethics. The Company will not initiate collaboration with parties who do not accept these conditions.

Furthermore, the Company reserves the contractual right to take any appropriate measures (including contract termination, without prejudice to any claim for damages if such behavior causes harm to Eurosyn) in the event that the counterparty, while acting in the name and/or on behalf of the Company, violates legal regulations or this Code of Ethics.

At the same time, the Company requires its collaborators and consultants to adopt the same rules of conduct both toward Eurosyn and toward third parties with whom they interact during their collaboration with Eurosyn.

5.2 Communication and Duty to Report

Eurosyn ensures the dissemination of the Code of Ethics to all recipients and promotes its awareness externally as well, making it accessible on the corporate website and through communication initiatives such as informational newsletters or other institutional communications.

The purpose of communicating the Code of Ethics is to foster understanding and shared adherence to the company's ethical principles among stakeholders, in line with the principles of transparency and responsibility.

To ensure the effective implementation of this Code of Ethics, Eurosyn establishes reporting channels through which anyone who becomes aware of potential unlawful conduct within the organization can report it freely, directly, and in complete confidentiality to Management.

All recipients are required to report behaviors that do not conform to the principles of the Code. Reports serve as a tool to protect the Organization and can also provide an opportunity to improve corporate processes and behaviors.

Management will ensure the confidentiality of the reporter's identity and protect them from retaliation, unlawful pressure, discomfort, or any form of workplace discrimination for having reported a violation of the Code.

5.3 Implementation of the Code of Ethics

The correct and effective application of the Code of Ethics is possible only through the commitment and cooperation of the entire organization, in collaboration with the bodies responsible for its implementation and monitoring.

The Code of Ethics is periodically reviewed by Management to ensure its continuous adequacy, alignment with the Management System, corporate policies, and the company's regulatory, organizational, and operational evolution, also taking into account reports, non-conformities, complaints, and results from the Management System.

The Code of Ethics does not replace existing corporate procedures but integrates and supports them by guiding individual and collective behaviors in alignment with the company's values and the objectives of Quality and continuous improvement.

Internal Control

The responsibility for overseeing compliance with this Code and reporting annually to the Board of Directors rests with the Chief Executive Officer.