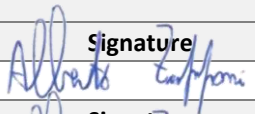
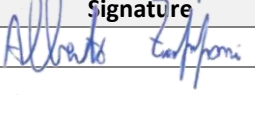


# CODE OF CONDUCT

## 2 ZETA SRL

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## PRELIMINARY REMARKS

2 Zeta S.r.l. (hereinafter also the "Company" or "2 Zeta"), which specializes in hot forging of brass alloys, is aware that the authority of a company is recognized not only by the competence of its employees and the high quality of its products, but also by the attention paid to the needs of the entire community and the establishment of business relationships marked by transparency and ethical negotiation.

For this reason, the Company has decided to have a Code of Ethics in order to ensure performance absolutely aligned with current regulations, with a high degree of competence and the utmost respect for the individual.

This Code of Ethics (hereinafter also the "Code"), has been approved by the Company's Sole Director and represents a distinctive and identifying element in relation to the market, the knowledge and sharing of which, required of all those who work in the Company or collaborate with it, constitute the foundation of the Company's activities and the first step in contributing to the pursuit of the objectives that 2 Zeta has set for itself.

## 1 - ADDRESSEES, APPLICATION AND VALIDITY OF THE CODE OF ETHICS

This Code of Ethics describes the set of ethical and moral principles that underlie the activity of 2 Zeta S.r.l. as well as the lines of conduct adopted by the Company both within its business (in relations with and between employees - **Recipients**) and externally (in relations with authorities and Public Administrations, suppliers, Customers, business partners, collaborators - **Recipients**). Compliance with these principles is of fundamental importance to achieve the company's objectives and to ensure the Company's reputation in the socio-economic context in which it operates.

Recipients of this Code of Ethics are all employees, without exception, and all those who, directly or indirectly, permanently or temporarily, establish relationships or relations with 2 Zeta S.r.l. and work for the pursuit of its objectives.

The Code of Ethics applies to all the Company's activities and is consequently binding on the conduct of its directors, shareholders, employees, collaborators and business partners. They are, therefore, obliged to be familiar with its rules and to refrain from conduct contrary to them.

In addition, 2 Zeta S.r.l. require its suppliers to conduct themselves in line with the general principles of this Code.

The Company is committed to the dissemination of this Code of Ethics, to the correct interpretation of its contents, and to the provision of every possible tool that promotes its full application.

## 2 – GENERAL PRINCIPLES

### IMPARTIALITY

In decisions affecting relations with its Interested Parties, 2 Zeta S.r.l. avoids all forms of discrimination on the basis of age, sex, sexual orientation, health status, race, class, national origin, union membership, political affiliation, and religion of its stakeholders.

### HONESTY

Within the scope of their professional activities, Recipients of this Code are required to diligently comply with applicable laws, the Code of Ethics and internal regulations. Under no circumstances may the pursuit of an interest of 2 Zeta S.r.l. justify dishonest conduct.

### COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2 Zeta S.r.l. operates in absolute compliance with all applicable national and international laws and directives.

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**CONFIDENTIALITY**

The Company ensures the confidentiality, in compliance with all applicable data protection regulations, of information of the Recipients of this Code and its Interested Parties in its possession. The Recipients of the Code of Ethics are required to maintain the utmost confidentiality on documents capable of revealing know-how, business information and corporate operations and, more generally, not to use confidential information, learned by reason of their work activity, for purposes unrelated to the exercise of that activity.

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**DILIGENCE**

The relationship between 2 Zeta S.r.l. and its employees is based on mutual trust. Employees are therefore expected to work to further the interests of the Company in accordance with the values set forth in this Code of Ethics.

In the conduct of any activity, situations must always be avoided where those involved in the transactions are, or may even just appear to be, in conflict of interest. By this is meant both the case in which an employee and/or collaborator pursues an interest other than the business mission and the balancing of interests of the Interested Parties or takes "personal" advantage of business opportunities of the company, and the case in which representatives of Customers or suppliers, or of public institutions, act contrary to the fiduciary duties attached to the position.

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**LOYALTY**

The Company and the Recipients of this Code of Ethics are committed to fair competition, in compliance with national and EU regulations, in the knowledge that virtuous competition is a healthy incentive for the protection of consumers and the community.

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**VALUE OF HUMAN RESOURCES**

2 Zeta's human resources are an indispensable factor for the success of the Company's *mission*. For this reason, the Company protects and promotes the value of human resources in order to improve and increase the assets and competitiveness of 2 Zeta S.r.l.

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**EQUITY OF AUTHORITY**

In the signing and management of contractual relationships involving the establishment of hierarchical relations, the Company is committed to ensuring that authority is not exercised with equity and fairness. In particular, 2 Zeta ensures that authority does not turn into the exercise of power detrimental to the dignity and autonomy of the employee and collaborator, and that work organization choices safeguard the value of employees and collaborators.

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**INTEGRITY AND PROTECTION OF THE PERSON**

2 Zeta guarantees working conditions that respect individual dignity and safe and healthy working environments. Therefore, requests or threats aimed at inducing people to act against the law and this Code of Ethics, or to engage in behavior detrimental to the moral and personal beliefs and preferences of its employees are not tolerated.

Behavior or speech that may upset a person's sensibilities should be avoided.

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**TRANSPARENCY AND COMPLETENESS OF INFORMATION**

Employees and collaborators of 2 Zeta S.r.l. are required to give complete, transparent, comprehensible and accurate information, so that, in setting up relations with the Company, the Interested Parties are able to make autonomous decisions aware of the interests involved, the alternatives and the relevant consequences.

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#### DILIGENCE AND ACCURACY IN THE EXECUTION OF TASKS AND CONTRACTS

Contracts and work assignments must be performed as consciously agreed upon by the parties. The Company undertakes not to exploit conditions of ignorance or incapacity of its counterparts.

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#### FAIRNESS AND EQUITY IN CONTRACT MANAGEMENT AND RENEGOTIATION

It is to be avoided that in existing relationships, anyone acting in the name and on behalf of the Company tries to take advantage of contractual gaps, or unforeseen events, to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the interlocutor has found himself.

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#### QUALITY OF SERVICES AND PRODUCTS

2 Zeta S.r.l. orients its activities to the satisfaction and protection of its Customers by listening to requests that can promote an improvement in the quality of products and services.

### 3 – RELATIONSHIP WITH EMPLOYEES AND CONTRACTORS

#### PERSONNEL SELECTION

Personnel evaluation and selection are carried out according to fairness and transparency, respecting equal opportunities in order to match the needs of 2 Zeta S.r.l., with the professional profiles, ambitions and expectations of the candidates.

The Company undertakes to take all useful measures to avoid any form of favoritism in the personnel selection process by using objective and meritocratic criteria, respecting the dignity of the candidates as well as in the interest of the smooth running of the company's business.

Recruited personnel, including through the implementation of this Code of Ethics, receive clear and correct information about the roles, responsibilities, rights and duties of the parties.

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#### PERSONNEL MANAGEMENT

2 Zeta protects and enhances its human resources, striving to maintain constant conditions necessary for the professional growth, knowledge and skills of each person, carrying out appropriate training for professional upgrading and any initiative aimed at pursuing this purpose.

The Company is firmly committed to combating incidents of *bullying*, *stalking*, psychological violence, and any behavior that is discriminatory or detrimental to a person's dignity on and off company premises.

Relations between employees should be conducted with loyalty, fairness and mutual respect, in observance of the values of civil coexistence and freedom of persons.

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#### WORKING ENVIRONMENT

2 Zeta is committed to providing its staff with a healthy, safe working environment that respects the dignity of workers and to spreading and consolidating a culture of safety by developing risk awareness and promoting responsible behavior by all employees.

The Company has adopted a Quality Management System in accordance with the UNI EN ISO 9001 Standard in order to ensure.

The continuous improvement and efficiency of corporate structures and its processes.

### 4 - ENTERPRISE MANAGEMENT

#### COMPLIANCE WITH INTERNAL PROCEDURES

2 Zeta S.r.l. believes that management efficiency and control culture are indispensable elements for the achievement of objectives. Recipients are required to strictly comply with the Company's internal procedures and instructions. Recipients must keep all appropriate records to keep track of actions taken on behalf of the Company.

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#### ACCOUNTING MANAGEMENT

In accounting management activities, Recipients are required to act in accordance with the principles of truthfulness, accuracy and transparency so that Press Metall's reputation is protected, both internally and externally. Adherence to these principles also enables the Company to plan its operating strategies based on its true economic and financial situation.

All items reported in the accounts must, therefore, be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity.

### 5 – EXTERNAL RELATIONS

#### RELATIONS WITH AUTHORITIES AND PUBLIC ADMINISTRATION

Relations with the Authorities and the Public Administration must be marked by the utmost clarity, transparency and cooperation, in full compliance with the law and according to high moral and professional *standards*. The Recipients, unless otherwise expressly authorized, may not relate in the name and on behalf of 2 Zeta S.r.l. with the Authorities and the Public Administration.

Authorized Recipients will be required to strictly comply with the provisions of this Code of Ethics, as well as, more generally, with the directives issued by Press Metall's *management*.

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#### RELATIONS WITH CUSTOMERS AND SUPPLIERS

Company personnel must refrain from any form of unfair or deceptive behavior that might lead Customers or suppliers to rely on unfounded facts or circumstances. 2 Zeta personnel are expected to strive consistently to offer a quality product, striving to limit any form of delay or disservice and to maximize Customer satisfaction.

Relations with suppliers are based on loyalty, fairness and transparency. Suppliers are chosen on the basis of objective criteria of cost-effectiveness, expediency and efficiency. All possible controls must be put in place so that suppliers and Customers are also able to comply with the basic ethical principles set forth in this Code.

### 6 – INTERNAL CONTROL SYSTEM

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by personnel, as well as by persons having business relations with the Company. Violation of the principles and behaviors set forth in the Code of Ethics compromises the fiduciary relationship between the Company and the offending Recipients and may result in sanctions of various kinds.

Compliance with the requirements of this Code of Ethics is entrusted to the prudent, reasonable and careful supervision of each of Press Metall's employees, within their respective roles and functions. Company personnel are encouraged to report facts and circumstances potentially in conflict with the principles and prescriptions of this Code to their immediate superiors. The *management* of 2 Zeta shall take all necessary measures to put an end to violations, being able to resort to any disciplinary measure in compliance with the Law and workers' rights, including union rights.

### 7 – GUIDELINES OF THE PENALTY SYSTEM

The internal control system is geared toward adopting tools and methodologies to counter potential risks company, in order to ensure compliance not only with the Law, but also with internal regulations and procedures.

In fact, violation of the principles set forth in the Code of Ethics and internal procedures compromises the fiduciary relationship between the Company and its directors, employees, suppliers, collaborators, and Customers. Such violations will, therefore, be pursued by 2 Zeta in an incisive and timely manner, through the adoption of appropriate and proportionate disciplinary measures.

The effects of violations of 2 Zeta's Code of Ethics and internal procedures must be taken into account by all those who, in any capacity, have relations with the Company. Depending on the seriousness of the conduct engaged in by the person involved in one of the unlawful activities set forth in the Code of Ethics, 2 Zeta will take appropriate action without delay, regardless of the possible prosecution by the Judicial Authority.

Notwithstanding the above, conduct in violation of the Code of Ethics constitutes:

- serious misconduct for employees, with the sanctions, applied depending on the severity, provided for in the relevant collective bargaining agreement (verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and pay up to a maximum of three working days, dismissal for just cause or justified reason);
- Just cause for removal of directors from office;
- cause for immediate termination of the relationship, in the most serious cases, for external collaborators;
- cause for immediate termination of the relationship, in the most serious cases, for suppliers.

The identification and application of sanctions will always take into account the general principles of proportionality and

Appropriateness to the violation charged.

In all of the aforementioned cases, 2 Zeta also reserves the right to exercise all actions it deems appropriate for compensation for damages suffered as a result of conduct in violation of the Code of Ethics.

## **8 – DIFFUSIONE E COMUNICAZIONE**

The Company is committed to spread out this Code of Ethics to all Recipients, using all available means of communication and opportunities such as, for example: the company website; specific communications; information meetings; and company training.

All Recipients must be able to access the Code of Ethics in order to know its contents and comply with its prescriptions.

The Company, if the need arises, uses appropriate training or informational sessions to ensure proper understanding of the Code of Ethics.

## **9 – FINAL PROVISIONS**

Any changes and/or additions to this Code of Ethics will be approved by the Sole Director of 2 Zeta S.r.l. and promptly disseminated to the Recipients previously identified.